

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

Civil Action - Law
No. 3:17-cv-00072-NKM

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ELIZABETH SINES, SETH WISPELWEY, :
MARISSA BLAIR, TYLER MAGILL, :
APRIL MUNIZ, HANNAH PEARCE, :
MARCUS MARTIN, NATALIE ROMERO, :
CHELSEA ALVARADO, and JOHN DOE, :

Plaintiffs, :

- vs - :

JASON KESSLER, et al., :

Defendants. :

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Deposition of ELLIOTT KLINE

228 Walnut Street	Wednesday, August 7, 2019
Harrisburg, PA	10:05 a.m.

IT IS HEREBY STIPULATED and agreed that the
sealing of the within transcript is waived.

IT IS FURTHER STIPULATED and agreed that all
objections except as to the form of the question
are reserved to the time of trial.

<p style="text-align: right;">Page 26</p> <p>1 type of, you know, violent -- like, a 2 premeditated violent plan against the people of 3 Charlottesville. Which isn't -- which isn't 4 true at all. And they are trying to seek 5 damages, I guess. Like, that is really all I 6 know about it. 7 Q. You indicated earlier that you are 8 familiar with an event called Unite the Right? 9 A. Mm-hmm. 10 Q. Correct? Were you one of the 11 organizers of Unite the Right? 12 A. Yes. 13 Q. You understand that you are here to 14 testify as part of the litigation Sines versus 15 Kessler, correct? 16 A. Correct. 17 MR. DiNUCCI: Mr. Barkai, can I 18 interject an objection? As I recall Judge 19 Hoppe's order in the matter, this deposition is 20 limited to the question of whether or not or the 21 issue of Mr. Kline's compliance or alleged 22 noncompliance with discovery-related Orders, not 23 the substance or merits of the case. 24 THE WITNESS: That is tomorrow. 25 MR. BARKAI: The questions are about</p>	<p style="text-align: right;">Page 27</p> <p>1 Mr. Kline's understanding of litigation, his 2 receipt of the Complaint, his compliance with 3 discovery throughout the process since being 4 served with the Complaint, including the 5 preservation of devices and of relevant 6 documents. 7 MR. DiNUCCI: I'll just set up one 8 more comment, then you do what you got to do. 9 But at least the answers are tending towards the 10 substance of the case, the merits of the case. 11 I thought I heard a question about whether or 12 not Mr. Kline was part of any effort to organize 13 the events. 14 That is my objection. But you can go 15 ahead. 16 MR. BARKAI: Well, organizing an event 17 would certainly lead to the inference that you 18 would have documents and discovery related to 19 the event. So, it is a relevant question. 20 BY MR. BARKAI: 21 Q. Mr. Kline, after you were sued you 22 hired attorneys, as you indicated, correct? 23 A. Through Identity Evropa. I was 24 represented through them, basically. As part of 25 my leading with our organization, part of the</p>
<p style="text-align: right;">Page 28</p> <p>1 deal was they would pay for my legal fees -- the 2 legal, the attorneys, things like that. 3 Q. What is Identity Evropa? 4 A. I believe it is no longer an 5 organization. But it was a -- originally it 6 started out as sort of an European-American 7 fraternity-type organization. Then it kind of 8 morphed and changed over time to something else 9 and became kind of what it was when it stopped 10 being an organization. I guess they called it 11 quits kind of months ago, from what I 12 understand. But, like I said, I don't follow a 13 whole lot of it anymore. 14 Q. You were formerly a member of Identity 15 Evropa; is that correct? 16 A. Yes. 17 Q. During what period? 18 A. Probably a year before 19 Charlottesville, maybe a year-and-a-half before 20 Charlottesville. So, I was a member for a year, 21 year-and-a-half, I would say. 22 Q. Beginning in approximately 2016? 23 A. Yeah. 24 Q. And ending when? 25 A. The summer of 2017, I want to say,</p>	<p style="text-align: right;">Page 29</p> <p>1 maybe. 2 Q. The summer of 2017, after Unite the 3 Right? 4 A. Yes. 5 Q. What led to your no longer being a 6 member of identity Evropa? 7 A. Umm, there was issues with me and the 8 owners or the leadership, Nathan Damingo. 9 Q. You stated that Identity Evropa as 10 part of your deal with the organization would 11 pay for your legal fees, correct? 12 A. Yes. 13 Q. Who was the attorney for whom Identity 14 Evropa paid at that time? 15 A. Umm, the -- I think it is the same 16 attorney they have now. I can't remember his 17 name off the top of my head. 18 Q. Is that Mr. Kolenich? 19 A. Yes, Kolenich. 20 Q. Mr. Woodard? 21 A. Originally I think they may have 22 started paying him. But I don't think Identity 23 Evropa kept doing that. Maybe they did. I am 24 not sure. 25 Q. In addition to being represented in</p>

<p style="text-align: right;">Page 34</p> <p>1 use other e-mail addresses that were, like, not 2 related to any Alt-Right stuff. Like, one of my 3 e-mail addresses, I think, that might have been 4 used on there was, like, an old one I had from 5 high school I never even used, or anything like 6 that. So, there might be, like, other e-mails 7 on -- e-mail addresses on there. But they were 8 old ones that I didn't even use anymore, or 9 didn't have anything to do with Alt-Right stuff. 10 Q. You have other e-mail addresses aside 11 from your Identity Evropa and Gmail addresses 12 that you never used for, quote, Alt-Right stuff? 13 A. Yeah. I mean, like, e-mails from when 14 I was in high school. E-mail addresses when I 15 was in high school and things like that. Or 16 college or in the Army and things like that. 17 Q. Did you ever use those e-mail 18 addresses to discuss Unite the Right? 19 A. No. 20 Q. When was the last time that you 21 remember using your own e-mail addresses? 22 A. Far before I did anything Alt-Right. 23 Q. And approximately when would that be? 24 A. I guess 2015, 2014 would be the very 25 latest. But I didn't start doing Alt-Right</p>	<p style="text-align: right;">Page 35</p> <p>1 stuff until 2016. So -- 2 I would say probably it is even 3 earlier than that. I haven't used those e-mail 4 addresses since 2012, 2013, or something like 5 that. 6 Q. When Mr. Kolenich and Mr. Woodard were 7 representing you, there were times when they 8 sent you documents, right? 9 A. Correct. 10 Q. Did they send you documents via 11 e-mail? 12 A. Yes. 13 Q. Did they send you documents via 14 physical U.S. Mail? 15 A. Umm, I don't believe so. I think all 16 the physical documents I have gotten have been 17 from the Court itself. 18 Q. You have received physical documents 19 from the Court, is that correct? 20 A. They get sent to my parents' house. 21 So, whenever I am around or near whatever, I 22 just swing by to pick up my mail, stuff like 23 that. I'll get it from -- I'll get it from them 24 then. 25 Q. How often do you swing by to pick up</p>
<p style="text-align: right;">Page 36</p> <p>1 your mail? 2 A. It is really sporadic. Sometimes it 3 is once a month, sometimes it is multiple times 4 a week I'll be there. It just depends what's 5 going on. 6 Q. You have testified that your parents 7 have contacted you to let you know you have mail 8 waiting for you, right? 9 A. They have done that in the past. They 10 don't always do that though. 11 Q. Do Mr. Kolenich and Mr. Woodard still 12 represent you? 13 A. No. 14 Q. Why do they no longer represent you? 15 A. Because they feel like I wasn't being 16 communicative with them as their -- I guess 17 their side of what happened. From what I 18 understand or what was going on at the time, 19 they -- we were going through the discovery 20 stuff and they asked me -- Mr. Kolenich had 21 asked me to produce things like Twitter accounts 22 that I don't have access to, Facebook accounts, 23 things like that. The discovery stuff. 24 And I had explained to him that I 25 didn't have access to it or anything like that</p>	<p style="text-align: right;">Page 37</p> <p>1 anymore. And then weeks later he called me back 2 and he actually said to me -- or him and a 3 couple other people. I think it was -- what's 4 his name? 5 One of the other members of Identity 6 Evropa had called me and let me know that, hey, 7 they are going to stop this lawsuit, they are 8 ending it, so you got to call the lawyer and let 9 him know if you would be okay with, like, a plea 10 deal or like a -- I don't know, some sort of 11 agreement. So, I said yes to that. And then 12 the week later or two weeks later I found out 13 from a news article that they had filed a motion 14 to remove me. 15 So, I was under the information that I 16 was -- I was being told there was going to be a 17 deal or that the case is going to be done with 18 or I was going to be dropped from it. In 19 reality, I was being dropped as a Defendant from 20 their law -- their legal team, I guess. 21 Q. Who is the other member of Identity 22 Evropa who called you? 23 A. Umm, Patrick Casey. 24 Q. Are you in communication with Patrick 25 Casey?</p>

<p style="text-align: right;">Page 46</p> <p>1 playing the game. There is nothing -- just 2 voice or whatever. 3 Q. Just voice only? 4 A. Just voice. 5 Q. Besides talking to Char Char Binks, 6 did you do anything else to prepare for today's 7 deposition? 8 A. No. 9 Q. Did you speak with or meet with Mr. 10 Kolenich in advance of the deposition? 11 A. No. 12 Q. Mr. Woodard? 13 A. No. 14 Q. Have you communicated with Jason 15 Kessler about his deposition? 16 A. No. 17 Q. Have you communicated with Erika 18 Alduino about her deposition? 19 A. No. 20 Q. Mr. Kline, where did you grow up? 21 A. Reading, Pennsylvania. 22 Q. Is that the address that we discussed 23 earlier as being your parents' address? 24 A. Yes. 25 Q. 117 Mesa Drive?</p>	<p style="text-align: right;">Page 47</p> <p>1 A. Yes. 2 Q. Where do you live now? 3 A. Umm, I am kind of moving between a 4 bunch of different places. I just house sit for 5 -- like, the last two weeks I house sitted for a 6 family. But I don't really have a permanent 7 address right now. I am kind of moving around, 8 trying to find a job. 9 Q. What is the address where you have 10 been house sitting? 11 A. I don't even know the address. It is 12 up in Allentown. 13 Q. Where did you live before Allentown? 14 A. I was -- like, after I left Virginia, 15 I lived with my parents for a little bit. And I 16 have been trying -- I have been driving around 17 trying to find a job all throughout 18 Pennsylvania. So, I might stay in, like, a 19 hotel one night, or stay with a friend or 20 college or something like that. But -- 21 Q. What is the last physical address that 22 you remember having? 23 A. The 117 Mesa Drive is the -- I guess 24 the best address. 25 Q. When did you leave that address?</p>
<p style="text-align: right;">Page 48</p> <p>1 A. I am there right now. But I might be 2 leaving in another week or two to go look for a 3 job. 4 Q. Where were you living in Virginia? 5 A. Umm, I got to remember the name of the 6 town. I can't believe I can't remember. Umm, 7 what was the name of that place? If I had my 8 phone out, I could just look at Google Maps and 9 know exactly where it is at. I just don't know 10 exactly where it is. 11 It is Loudoun. Loudoun County. So, 12 whatever town -- the town that is in Loudoun 13 County, that is where it was. 14 Q. Have you ever lived in 15 Charlottesville? 16 A. No. 17 Q. Your name is Elliott Kline, but you go 18 by Eli Mosley, right? 19 A. I went by that. I no longer go by 20 that name. 21 Q. Why did you go by Eli Mosley at the 22 time? 23 A. Pretty much everyone in the Alt-Right 24 had, like, a pseudonym or, like, a fake name for 25 anonymity.</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. For anonymity? 2 A. Yeah. 3 Q. Why did you choose Eli Mosley? 4 A. Umm, at the time -- well, Elliott, 5 Eli. That's pretty simple. Mosley was just -- 6 he is a political figure from the United Kingdom 7 who I was reading at the time. 8 Q. When did you stop using that name? 9 A. Uh, probably, I mean, a year ago. 10 Maybe a little bit more than a year ago. 11 Q. How old are you? 12 A. 27. 13 Q. What is the highest level of education 14 that you have received? 15 A. Some college. 16 Q. Where were you in college? 17 A. Shippensburg University, and then 18 Millersville University. 19 Q. You did not graduate; is that right? 20 A. No. 21 Q. What were you studying? 22 A. Political science at Shippensburg and 23 computer science in Millersville. 24 Q. Are you employed now? 25 A. No.</p>

<p style="text-align: right;">Page 66</p> <p>1 Q. But you are not aware of who was 2 operating Identity Evropa's social media 3 accounts? 4 A. No. Like I said, at the time I am 5 pretty sure in the Discord we had, like, a thing 6 that was, like, social media posts, I think was 7 the name of the channel, maybe. I don't know. 8 And we would -- I would post in there, then it 9 would get posted on the Twitter. I don't even 10 know who would do it. I don't remember who it 11 was, or anything like that. 12 Q. Did you e-mail those posts to people 13 to post? 14 A. No. Like I said, I never -- I almost 15 never use e-mail, outside of talking this legal 16 stuff, really. 17 Q. Did you text posts for people to post? 18 A. Umm, no, not -- no. Because I 19 wouldn't have had their numbers. No one shared 20 phone numbers, right. So, it was mostly all 21 through Discord, is how most of the 22 communication happened. 23 Q. Your testimony is that you would write 24 a social media post for Identity Evropa in 25 Discord, and then someone else would post it?</p>	<p style="text-align: right;">Page 67</p> <p>1 A. Yes. Either through Discord or -- I 2 am trying -- I don't think there is any other 3 way. It would have been either a direct message 4 on Discord, like a private message, or on the 5 actual Identity Evropa Discord server. But I 6 don't know who that person would be that had the 7 credentials or anything like that. 8 Q. Do you remember anything about that 9 person? 10 A. No. I don't even know if it was a 11 male or female. I don't know. I don't 12 remember. And I think that job changed hands a 13 few times as well. So, you know, like I said, I 14 don't really remember. 15 Q. Did you discuss those social media 16 posts over the phone? 17 A. No, not that I know of. 18 Q. Did Identity Evropa participate in the 19 planning of Unite the Right? 20 A. Umm, yes. A little -- I would say a 21 little bit. I wouldn't say they were -- it is 22 kind of hard to say, like, separate who was in 23 Identity Evropa and helping organize, I guess 24 you could say, then who was organizing as an 25 Identity Evropa member, if that makes sense.</p>
<p style="text-align: right;">Page 68</p> <p>1 It was kind of, like, a loose 2 collection of groups, and each group was, like, 3 given a broad outline. And then within those 4 groups they were expected to kind of do their 5 own organizing, I guess you could say. 6 Q. The members of Identity Evropa, 7 whether individually or as part of the 8 organization, did work on organizing Unite the 9 Right, correct? 10 A. Yes. 11 Q. Including creating documents? 12 A. Yes. 13 Q. Sending e-mails? 14 A. I don't know about sending e-mails. 15 But creating documents, sure. 16 Q. Where would those documents be 17 located? 18 A. Well, they have all been leaked. So, 19 the -- they were originally posted on the 20 Discord server. Not the Identity Evropa Discord 21 server, but the -- I think there might be 22 something on Identity Evropa's Discord server. 23 But the, like, event, the Unite the Right 24 Discord server. 25 So, there was the Identity Evropa</p>	<p style="text-align: right;">Page 69</p> <p>1 Discord server, then there was the Unite the 2 Right Discord server. That was for not -- non 3 Identity Evropa people. There was way many 4 people on that server. And any documents that 5 were produced would be posted on that server. 6 Which, again, was deleted. 7 (Exhibit 5, transcript of 7/2/2019 8 telephonic discovery hearing, marked for 9 identification.) 10 BY MR. BARKAI: 11 Q. Mr. Kline, I am going to now ask some 12 more detailed questions about the devices that 13 you used to communicate regarding Unite the 14 Right, as well as more generally. 15 First, you appeared at the July 2, 16 2019 hearing in this matter, right? 17 A. Yes. 18 Q. Does this exhibit in front of you 19 appear to you to be a transcript of that 20 hearing? 21 A. Umm, yes. 22 Q. Could you turn to Page 19, please? 23 A. Okay. 24 Q. Do you see at the top of that page 25 where you told the Judge, so, currently, as far</p>

<p style="text-align: right;">Page 74</p> <p>1 that you have now here on the table to</p> <p>2 communicate regarding Unite the Right?</p> <p>3 A. Mostly on -- using Discord app on the</p> <p>4 phone and making phone calls. Very few text</p> <p>5 messages. Because, like I said, most people</p> <p>6 didn't exchange phone numbers. And little to no</p> <p>7 e-mail. And then just making -- like, using</p> <p>8 Google docs on it, stuff like that.</p> <p>9 Q. What about photos? Do you have photos</p> <p>10 on that phone?</p> <p>11 A. Yeah.</p> <p>12 Q. Are they photos related to Unite the</p> <p>13 Right?</p> <p>14 A. No.</p> <p>15 Q. You don't have a single photo related</p> <p>16 to Unite the Right?</p> <p>17 A. Not that I -- not that I know of.</p> <p>18 People didn't really like taking pictures of</p> <p>19 each other and things like that, because they</p> <p>20 didn't want their identities revealed and stuff</p> <p>21 like that. So, taking pictures is a big no-no.</p> <p>22 You don't take pictures of the other people.</p> <p>23 Q. Did you at any time have any photos</p> <p>24 related to Unite the Right?</p> <p>25 A. Umm, no. I can't remember a time --</p>	<p style="text-align: right;">Page 75</p> <p>1 there is no pictures taken, or anything like</p> <p>2 that. Other than a few people walking around,</p> <p>3 things like that.</p> <p>4 Q. There may have been pictures of people</p> <p>5 walking around?</p> <p>6 A. But not on my phone. None of the</p> <p>7 pictures on my phone are related to Unite the</p> <p>8 Right. All the pictures on my phone are just,</p> <p>9 like, personal, like, goofy stuff. None of it</p> <p>10 is at all related to the thing.</p> <p>11 Q. Do you have social media apps on your</p> <p>12 phone?</p> <p>13 A. I do, but none of them are working</p> <p>14 because I have been removed from all those. So,</p> <p>15 like, Twitter -- like, Twitter wouldn't work on</p> <p>16 my phone, Facebook wouldn't work on my phone.</p> <p>17 Umm, and now Discord doesn't work on my phone.</p> <p>18 Q. Do you have logs on your phone of</p> <p>19 people with whom you made phone calls?</p> <p>20 A. No.</p> <p>21 Q. You don't have any call logs on your</p> <p>22 phone?</p> <p>23 A. I mean, there is, like, the recent</p> <p>24 call list. But I don't know how far back it</p> <p>25 goes or anything.</p>
<p style="text-align: right;">Page 76</p> <p>1 Q. Are the text messages still on your</p> <p>2 phone from Unite the Right?</p> <p>3 A. Yes. Like I said, there is very few</p> <p>4 of them.</p> <p>5 Q. Returning to photos, you did not take</p> <p>6 any photos on August 12?</p> <p>7 A. Not that I can remember, no. Not that</p> <p>8 I -- I would have to look through the phone to</p> <p>9 see. But none of the pictures that I think --</p> <p>10 none of the pictures I am aware of are from</p> <p>11 Unite the Right or anything like that.</p> <p>12 Q. You didn't take a single photo on</p> <p>13 August 11?</p> <p>14 A. Not that I know of, no.</p> <p>15 Q. Not that you know of?</p> <p>16 A. No.</p> <p>17 Q. You testified that you made phone</p> <p>18 calls regarding Unite the Right, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Whom did you discuss Unite the Right</p> <p>21 with over the phone using phone calls?</p> <p>22 A. We had, like, I guess, the weekly</p> <p>23 phone call with most of, like, the leaders of</p> <p>24 the organizations that were going or people</p> <p>25 putting it together. So, it would have been</p>	<p style="text-align: right;">Page 77</p> <p>1 people like me, Kessler. I can't even remember</p> <p>2 any of the other people. I am sure it is people</p> <p>3 on this list.</p> <p>4 Mr. Heimbach was on a few of them, I</p> <p>5 know that. Umm, but I don't -- I don't really</p> <p>6 remember any of the other people that would have</p> <p>7 been on there. But there is phone calls on</p> <p>8 that. And then other than on the ground that</p> <p>9 day, I had plenty of phone calls. The primary</p> <p>10 mode of communication at the rally was my phone,</p> <p>11 calling people. That is how I talked to the</p> <p>12 police, that is how I talked to the police the</p> <p>13 night before. That is how I talked to, like,</p> <p>14 our sound crew that was stuck there, things like</p> <p>15 that.</p> <p>16 Q. So, you have testified that you had</p> <p>17 calls with Jason Kessler, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Matthew Heimbach, correct?</p> <p>20 A. Yes.</p> <p>21 Q. Do you remember having phone calls</p> <p>22 with Erika Alduino?</p> <p>23 A. Yes.</p> <p>24 Q. You have testified that you had plenty</p> <p>25 of phone calls on the ground, correct?</p>

<p style="text-align: right;">Page 78</p> <p>1 A. Yes.</p> <p>2 Q. With whom?</p> <p>3 A. Mostly it was with the police,</p> <p>4 actually. The -- both at the rally and the</p> <p>5 night -- the Torch March the night before. I</p> <p>6 was on the police. Like, every five minutes I</p> <p>7 called them.</p> <p>8 Q. Who did you speak to at the police?</p> <p>9 A. I do not remember their name.</p> <p>10 Q. You do not remember a single name of</p> <p>11 anyone from the police you spoke?</p> <p>12 A. Both of them are female. Umm, I know</p> <p>13 one of them accused me of lying to some court,</p> <p>14 some -- I read in some news article that she</p> <p>15 said I lied. But it doesn't make sense because</p> <p>16 -- I mean, the phone records are there. There</p> <p>17 is no way the police don't have it recorded.</p> <p>18 Where -- I didn't lie at all. I told them -- I</p> <p>19 was very honest with them with what we were</p> <p>20 doing and what was going on.</p> <p>21 Q. Did you ever speak with anyone from</p> <p>22 the police department in any way other than</p> <p>23 phone calls?</p> <p>24 A. Umm, I spoke to -- I actually -- one</p> <p>25 person I spoke with is a detective, I believe it</p>	<p style="text-align: right;">Page 79</p> <p>1 was, in Charlottesville, leading up to the</p> <p>2 rally. He was kind of trying to figure out,</p> <p>3 like, who was coming and what the different</p> <p>4 groups were, I guess. From both the left and</p> <p>5 the right.</p> <p>6 And I just -- I had spoken to him. I</p> <p>7 don't remember his name. But I know it was a</p> <p>8 detective in Charlottesville. And then -- I</p> <p>9 don't remember who else I would have spoken to.</p> <p>10 Q. Did you ever use e-mails to</p> <p>11 communicate with --</p> <p>12 A. No.</p> <p>13 Q. -- the police?</p> <p>14 A. No.</p> <p>15 Q. Text messages?</p> <p>16 A. No. No text messages with the police.</p> <p>17 Q. How did you first communicate with</p> <p>18 them via phone?</p> <p>19 A. I think -- I think either I received</p> <p>20 an e-mail, maybe, on Identity Evropa e-mail, I</p> <p>21 think it might have been. Or somebody else had</p> <p>22 spoken to this person and sent me -- and said</p> <p>23 hey, you should talk to this detective.</p> <p>24 I think that is actually what it was,</p> <p>25 was somebody told me, hey, this detective is</p>
<p style="text-align: right;">Page 80</p> <p>1 still trying to get -- figure out who is coming.</p> <p>2 I don't remember who told me that. I just</p> <p>3 remember calling the detective and talking to</p> <p>4 him about, hey, this is who's coming, this is</p> <p>5 what's going on, or whatever. But that is it.</p> <p>6 Q. Is that e-mail still on your phone?</p> <p>7 A. None of the e-mails from the Identity</p> <p>8 Evropa e-mail are on my phone. I can't log into</p> <p>9 the account at all.</p> <p>10 Q. If you were to log into the account,</p> <p>11 would the e-mails still be there?</p> <p>12 A. I don't think so. I think Gmail -- I</p> <p>13 mean, the only way I could think of that you</p> <p>14 would be able to retrieve those e-mails is if</p> <p>15 you contacted Google itself and got it. Because</p> <p>16 I think what happened was they removed me from</p> <p>17 their server -- or from their access, right.</p> <p>18 So, I got removed from the Identity Evropa at</p> <p>19 Gmail account access.</p> <p>20 When I got removed from that, I was no</p> <p>21 longer able to use my phone's e-mail at all.</p> <p>22 Because it wouldn't -- it kept saying try to log</p> <p>23 in, then it would say this account doesn't</p> <p>24 exist. And then I think a couple months after</p> <p>25 that I got removed. I think a couple months</p>	<p style="text-align: right;">Page 81</p> <p>1 after that Gmail removed their services. So,</p> <p>2 they said, hey, we are not letting you use our</p> <p>3 services anymore at all.</p> <p>4 So, the only way I could think of is</p> <p>5 -- would be Gmail or Google having them on their</p> <p>6 server somewhere backed up. Because, like I</p> <p>7 said, even if I log into my -- like, even if I</p> <p>8 type my password into my Gmail -- to the</p> <p>9 Identity Evropa account right now, if I were to</p> <p>10 type it in, it says this account doesn't exist.</p> <p>11 Q. When did Google remove Identity</p> <p>12 Evropa's services?</p> <p>13 A. I have -- I don't know. I have no</p> <p>14 idea. It was sometime after I got removed from</p> <p>15 Identity Evropa. So --</p> <p>16 Q. When was the last time that you</p> <p>17 remember logging into your Identity Evropa</p> <p>18 e-mail?</p> <p>19 A. Umm, the summer of -- I guess it was</p> <p>20 spring. March, May. I would say May 2018,</p> <p>21 maybe. Maybe a little earlier than that. Maybe</p> <p>22 April or March, somewhere in there. 2018. So,</p> <p>23 not a year after, you know, but almost a year</p> <p>24 after, half a year after Unite the Right.</p> <p>25 Q. That was after the lawsuit was filed</p>

<p style="text-align: right;">Page 82</p> <p>1 against you, correct?</p> <p>2 A. Correct.</p> <p>3 Q. Did you ever save any of those e-mails</p> <p>4 anywhere else?</p> <p>5 A. No. I never thought that I would have</p> <p>6 to. I thought it would be on whatever they had,</p> <p>7 or whatever. I didn't think I was going to get</p> <p>8 my access taken away.</p> <p>9 Q. Did you ever take any screen shots of</p> <p>10 any e-mails?</p> <p>11 A. No.</p> <p>12 Q. Did you ever back up those e-mails</p> <p>13 onto any external device?</p> <p>14 A. No.</p> <p>15 Q. Did you ever save any of those e-mails</p> <p>16 onto any type of cloud service?</p> <p>17 A. No.</p> <p>18 Q. You testified that you had a weekly</p> <p>19 phone call with others regarding the planning of</p> <p>20 Unite the Right, correct?</p> <p>21 A. Mm-hmm.</p> <p>22 Q. You testified those phone calls</p> <p>23 including Jason Kessler?</p> <p>24 A. Umm, yeah.</p> <p>25 Q. Did they include Richard Spencer?</p>	<p style="text-align: right;">Page 83</p> <p>1 A. Sometimes. Not often.</p> <p>2 Q. Did they include Christopher Cantwell?</p> <p>3 A. No.</p> <p>4 Q. Did they include James Alex Fields,</p> <p>5 Jr.?</p> <p>6 A. No. I didn't know who that was until</p> <p>7 after the whole thing happened.</p> <p>8 Q. Did they include members of Vanguard</p> <p>9 America?</p> <p>10 A. Umm, yes.</p> <p>11 Q. Which members?</p> <p>12 A. I wouldn't know their names. I</p> <p>13 wouldn't -- I don't even know the names they</p> <p>14 went by. I can't remember their names. They</p> <p>15 had a weird leadership thing going on at the</p> <p>16 time where they were changing leaders. So,</p> <p>17 whoever their old leader was, is I assume who it</p> <p>18 would be. Not the one that they have now.</p> <p>19 Whoever it would have been at the time. Whoever</p> <p>20 who that is. I don't remember his name.</p> <p>21 Q. Did the weekly phone calls include</p> <p>22 Andrew Anglin?</p> <p>23 A. No.</p> <p>24 Q. Did the weekly phone calls include</p> <p>25 Robert Azzmador Ray?</p>
<p style="text-align: right;">Page 84</p> <p>1 A. No.</p> <p>2 Q. Did they include Mr. Damingo?</p> <p>3 A. Umm, no.</p> <p>4 Q. Did they include other members of</p> <p>5 Identity Evropa?</p> <p>6 A. Umm, not that I really remember. Not</p> <p>7 that I remember specifically. No.</p> <p>8 Q. Did they include Michael Hill?</p> <p>9 A. Umm, yes. From Southern -- League of</p> <p>10 the South, or whatever, right? That's who</p> <p>11 Michael Hill is, correct?</p> <p>12 Q. To the best of your recollection.</p> <p>13 A. Yeah, I think Michael Hill is from --</p> <p>14 yeah, yes.</p> <p>15 Q. Did they include Matthew Parrott?</p> <p>16 A. No.</p> <p>17 Q. Did they include Michael Tubbs?</p> <p>18 A. I don't know who that is.</p> <p>19 Q. Did they include Jeff Schoep?</p> <p>20 A. No.</p> <p>21 Q. Did they include Augustus Sol Invictus?</p> <p>22 A. Sometimes.</p> <p>23 Q. Did they include Michael Peinovich,</p> <p>24 known as Mike Enoch?</p> <p>25 A. Umm, no.</p>	<p style="text-align: right;">Page 85</p> <p>1 Q. Did they include Andrew Anglin?</p> <p>2 A. No.</p> <p>3 Q. You have testified at -- both today</p> <p>4 and you told the Court that your old cell phone</p> <p>5 that you have there on the table has text</p> <p>6 messages, right?</p> <p>7 A. Mm-hmm, yes.</p> <p>8 Q. And those text messages include text</p> <p>9 messages about Unite the Right, correct?</p> <p>10 A. Yes.</p> <p>11 Q. With whom did you send and receive</p> <p>12 text messages regarding Unite the Right?</p> <p>13 A. Umm, there is -- like I said before,</p> <p>14 there was very few text messages that I</p> <p>15 remember. Most of it was done through Discord.</p> <p>16 Like, 95 percent or more of our communication</p> <p>17 was done through Discord. Like, most of it was.</p> <p>18 The only time I can think of text</p> <p>19 messages, umm, being sent would have been when</p> <p>20 -- I know Friday night was the Torch Rally, the</p> <p>21 Torch March, and Saturday was the rally. And I</p> <p>22 know the -- after what happened at the Torch</p> <p>23 Rally happened, or Torch March happened, Chris</p> <p>24 Cantwell texted me and asked if he could call</p> <p>25 me. So, there would be a text there. Then he</p>

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1 A. Yes.

2 Q. Why did you get that Walmart phone?

3 A. It was because this phone was not

4 working at the time. So -- and I kept getting

5 phone calls from people I didn't want to get

6 phone calls from.

7 Q. In what way was that phone not

8 working?

9 A. It wasn't receiving any connection to

10 -- it was water damaged. So, I had to get a

11 part in it replaced, then it was fixed, like, a

12 month or two after it happened.

13 Q. When the phone was damaged by water,

14 was any of the content of it lost?

15 A. No, everything on it was still on it.

16 Q. How do you know?

17 A. Because -- I mean, it might -- stuff

18 might have gotten deleted for all I know. But

19 like I said, I went through it. Everything was

20 fine. All the photos were still there, all the

21 text messages were still there that I -- nothing

22 -- contacts were still there. Nothing changed

23 on the phone. All my apps were still there. No

24 memory change happened on the phone.

25 Q. So, at that time you had two phones.

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1 A. Umm, I have gotten that phone fixed

2 multiple times. This phone -- I got the water

3 damage replaced. That was between, I guess,

4 2018 -- spring, summer of 2018. And then just a

5 couple weeks ago this wasn't working and I got

6 it fixed again. And I just got this new phone

7 that I haven't activated yet.

8 Q. So, in spring of 2018, your iPhone was

9 water damaged?

10 A. Mm-hmm.

11 Q. And you got a Walmart phone, right?

12 A. Correct.

13 Q. You used the Walmart phone for --

14 A. About three months.

15 Q. -- three months. And then -- umm --

16 A. I started using this phone again.

17 Q. Then you started using that phone

18 again, the iPhone that you told the Court about,

19 correct?

20 A. Correct.

21 Q. What happened to the Walmart phone

22 then?

23 A. I still have it. I would have to look

24 exactly where it is at. It somewhere in one of

25 my bags. I have a bunch of boxes from when I

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1 You had the iPhone and you had the Walmart

2 phone, correct?

3 A. Mm-hmm, yes.

4 Q. And how long did you have the Walmart

5 phone for?

6 A. Only maybe two, three months, maybe.

7 Something like that. I don't know. It wasn't

8 very long.

9 Q. When was this?

10 A. It was me leaving Virginia. So, like,

11 a year-and-a-half ago. So -- whenever I left

12 Virginia. So, that would have been 2018, spring

13 of 2018.

14 Q. It was in the spring of 2018 that you

15 had the Walmart phone?

16 A. Spring, summer of 2018. Yeah.

17 Q. When did you stop using the Walmart

18 phone?

19 A. The moment I got this fixed. So, it

20 was -- like I said, it was maybe three months, I

21 would say, if I had to guess, I used that phone.

22 But I didn't really use it that much, the

23 Walmart phone.

24 Q. Mr. Kline, you have testified that you

25 got that phone fixed this year, correct?

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1 moved. It is in one of those.

2 Q. When was the last time you saw the

3 Walmart phone?

4 A. Months ago. Like, three or four

5 months ago. Maybe -- maybe longer.

6 Q. Was the Walmart phone -- is the

7 Walmart phone also a smart phone?

8 A. Umm, I guess technically it is, I

9 think. But I didn't have any of that stuff

10 turned on it, like the internet, browser,

11 anything like that.

12 Q. Which phone number was connected to

13 that Walmart phone?

14 A. I don't remember the phone number for

15 it. I mean, I might have -- I don't even have

16 it -- it is not on. But I don't remember what

17 the phone number for it was. It was a Virginia

18 number. That is all I know.

19 Q. It was not your 610 number?

20 A. No.

21 Q. After your iPhone was fixed, was that

22 then the only phone you were using?

23 A. Correct.

24 Q. When did you stop using that phone?

25 A. The iPhone? This iPhone?

<p style="text-align: right;">Page 106</p> <p>1 guess there was multiple different departments</p> <p>2 and things like that there, police departments</p> <p>3 and things. They said they were able to</p> <p>4 communicate to multiples, to whoever it was.</p> <p>5 Q. You don't remember whether it was</p> <p>6 Charlottesville Police?</p> <p>7 A. No. I think it was, but I am not</p> <p>8 entirely sure.</p> <p>9 Q. Or State Police?</p> <p>10 A. Umm, sounds like to me like that would</p> <p>11 have been something State Police would do, kind</p> <p>12 of overseeing everybody. But I don't know for</p> <p>13 sure who that was.</p> <p>14 Q. You testified earlier that there were</p> <p>15 -- that there was, quote, a plan on how</p> <p>16 everything was going to happen?</p> <p>17 A. Yes.</p> <p>18 Q. Right? Are there any documents</p> <p>19 regarding that plan?</p> <p>20 A. Yes.</p> <p>21 Q. What are those documents?</p> <p>22 A. They are the documents that were</p> <p>23 already leaked all over the internet. Umm, the</p> <p>24 planning document that was put on the Discord.</p> <p>25 Umm, and, like I said, it was leaked everywhere.</p>	<p style="text-align: right;">Page 107</p> <p>1 So, I am sure you guys have seen it or have it.</p> <p>2 Q. Do you have those documents?</p> <p>3 A. I mean, I have them on the Google</p> <p>4 drive for Identity Evropa, or whatever. I don't</p> <p>5 have physical copies or anything like that.</p> <p>6 Q. You have never produced any documents</p> <p>7 regarding those plans, right?</p> <p>8 A. Umm --</p> <p>9 Q. To Plaintiffs.</p> <p>10 A. Oh, no, no.</p> <p>11 Q. Are there other documents besides what</p> <p>12 you called, quote, the plan document? Any other</p> <p>13 documents?</p> <p>14 A. No.</p> <p>15 Q. I am going to ask you a couple</p> <p>16 questions about the use of computers to</p> <p>17 communicate and make documents regarding Unite</p> <p>18 the Right.</p> <p>19 You testified that you -- that you</p> <p>20 primarily used your iPhone, the iPhone that you</p> <p>21 have with you here to create documents, right?</p> <p>22 A. Mm-hmm, yes.</p> <p>23 Q. Have you ever used a computer to make</p> <p>24 documents regarding Unite the Right?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 108</p> <p>1 Q. Not a single time?</p> <p>2 A. No.</p> <p>3 Q. Have you ever used a computer to</p> <p>4 communicate regarding Unite the Right?</p> <p>5 A. Umm, maybe Mr. Spencer -- Richard</p> <p>6 Spencer's computer. Maybe I used his once or</p> <p>7 twice while I was at his place. But it would</p> <p>8 have been to either type something up or print</p> <p>9 something out.</p> <p>10 Q. When would that have been?</p> <p>11 A. Leading up to the Unite the Right.</p> <p>12 So, months before.</p> <p>13 Q. You testified that it would have been</p> <p>14 to type something up, right?</p> <p>15 A. Yeah. Like, not necessarily related</p> <p>16 to Unite the Right. Like, just typed something</p> <p>17 unrelated up.</p> <p>18 Q. Have you ever used Richard Spencer's</p> <p>19 computer to type something up related to Unite</p> <p>20 the Right?</p> <p>21 A. No, I don't think so.</p> <p>22 Q. You are not sure?</p> <p>23 A. Umm --</p> <p>24 MR. DiNUCCI: Objection,</p> <p>25 characterization.</p>	<p style="text-align: right;">Page 109</p> <p>1 You may answer.</p> <p>2 THE WITNESS: Not -- I am not sure.</p> <p>3 BY MR. BARKAI:</p> <p>4 Q. What were the circumstances under</p> <p>5 which you were going to Mr. Spencer's --</p> <p>6 A. I was just at Mr. Spencer's house.</p> <p>7 Q. -- place?</p> <p>8 A. And his computer would be out and we</p> <p>9 were putting movies on or whatever on the TV</p> <p>10 through his computer.</p> <p>11 Q. When was that?</p> <p>12 A. I mean, all the time whenever we would</p> <p>13 be at his place. So, before Unite the Right or</p> <p>14 after Unite the Right.</p> <p>15 Q. In the months leading up to Unite the</p> <p>16 Right; is that correct?</p> <p>17 A. Yes.</p> <p>18 Q. And afterwards?</p> <p>19 A. Yes.</p> <p>20 Q. It would have been under those</p> <p>21 circumstances at Mr. Spencer's house when you</p> <p>22 may have used a computer to type something up?</p> <p>23 A. Yes.</p> <p>24 Q. It may have been related to Unite the</p> <p>25 Right?</p>

<p style="text-align: right;">Page 110</p> <p>1 A. No, I don't think any of it was. The</p> <p>2 only -- the only document typing or anything</p> <p>3 like that, creation that I did, was on my Google</p> <p>4 drive to Google docs, copying it and pasting it</p> <p>5 and making it into that -- putting it on</p> <p>6 Discord, was that document explaining the rules</p> <p>7 and what everyone was doing, the planning</p> <p>8 document that got leaked.</p> <p>9 That is the only documents that I made</p> <p>10 or created for the event.</p> <p>11 Q. Did you make any promotional</p> <p>12 materials, such as a poster?</p> <p>13 A. I didn't make any of that. Somebody</p> <p>14 else did.</p> <p>15 Q. Did you discuss with others who made</p> <p>16 promotional materials, what those materials</p> <p>17 were?</p> <p>18 A. I believe Jason Kessler handled all</p> <p>19 that stuff.</p> <p>20 Q. When you say somebody else made</p> <p>21 promotional materials, who would that have been?</p> <p>22 A. I have no idea who made -- who made</p> <p>23 the stuff. Like I said, Jason Kessler handled</p> <p>24 that kind of thing. The promotion, the</p> <p>25 promotional stuff, the speakers, things like</p>	<p style="text-align: right;">Page 111</p> <p>1 that.</p> <p>2 Q. Did you write any articles about Unite</p> <p>3 the Right?</p> <p>4 A. Articles for what? For -- no, I</p> <p>5 didn't produce any -- publish any articles or</p> <p>6 anything like that.</p> <p>7 Q. Did you write any kind of blog post</p> <p>8 about Unite the Right?</p> <p>9 A. Umm, not that I can remember.</p> <p>10 Q. Have you used a computer to send</p> <p>11 e-mails regarding Unite the Right?</p> <p>12 A. Other than the court case stuff, no.</p> <p>13 Q. But you have used a computer to send</p> <p>14 e-mails regarding the court case?</p> <p>15 A. Just, like, responding -- when the</p> <p>16 phone wasn't working, I would just use, like,</p> <p>17 whatever computer I could get. Like, I went to</p> <p>18 a -- I think I went to -- I don't even know what</p> <p>19 the hell they are called. One of those internet</p> <p>20 cafe places just to get to my e-mail once. I</p> <p>21 don't remember where it was. It was in</p> <p>22 Lancaster City. But it was just trying to get</p> <p>23 to my e-mail, to e-mail them back.</p> <p>24 Q. When was that?</p> <p>25 A. I don't know. Sometime before all the</p>
<p style="text-align: right;">Page 112</p> <p>1 -- before they filed this. So, before July.</p> <p>2 Q. Which e-mail address would that have</p> <p>3 been?</p> <p>4 A. The Eli F. Mosley one.</p> <p>5 Q. Did you own a computer in 2017?</p> <p>6 A. Umm, in 2017. So, that is the year of</p> <p>7 the rally and stuff. Yes, I did. But I didn't</p> <p>8 -- basically what happened with me was I had</p> <p>9 gotten let go of my job in late 2016 and I moved</p> <p>10 down to South Carolina with my girlfriend at the</p> <p>11 time. I wasn't able to bring any of my stuff,</p> <p>12 which included my computer and lots of other</p> <p>13 stuff.</p> <p>14 Q. What job had you gotten let go of in</p> <p>15 late 2016?</p> <p>16 A. I was an HR manager for a company</p> <p>17 called JC Ehrlich.</p> <p>18 Q. When you moved down to South Carolina,</p> <p>19 why were you not able to bring your computer?</p> <p>20 A. I couldn't fit all my stuff in the</p> <p>21 car. I just brought my clothes and stuff like</p> <p>22 that.</p> <p>23 Q. So, what happened to your computer</p> <p>24 then?</p> <p>25 A. It was set in my parents' storage</p>	<p style="text-align: right;">Page 113</p> <p>1 shed, I think. It was -- it was a computer I</p> <p>2 used for work, for when I had the job at JC</p> <p>3 Ehrlich.</p> <p>4 Q. Where is that computer now?</p> <p>5 A. At my parents' place.</p> <p>6 Q. Do you use that computer now?</p> <p>7 A. No.</p> <p>8 Q. Does the computer still work?</p> <p>9 A. I think so. Probably.</p> <p>10 Q. When did you first get that computer?</p> <p>11 A. Probably 2012.</p> <p>12 Q. What kind of computer is it?</p> <p>13 A. Just a -- I don't know, desktop</p> <p>14 computer.</p> <p>15 Q. Do you know the brand of computer it</p> <p>16 is?</p> <p>17 A. No. I think it is custom -- it is</p> <p>18 just kind of a Frankenstein machine.</p> <p>19 Q. You used that computer in 2017, right?</p> <p>20 A. No, no, no. No. Like I said --</p> <p>21 Q. Excuse me, you used that computer in</p> <p>22 2016, right?</p> <p>23 A. Yes. But it was -- like I said, it</p> <p>24 was before most of the Alt-Right stuff.</p> <p>25 Q. When was the last time that you used</p>

<p style="text-align: right;">Page 114</p> <p>1 that computer?</p> <p>2 A. Late 2016.</p> <p>3 Q. It has been sitting in the storage</p> <p>4 shed since then?</p> <p>5 A. Yes.</p> <p>6 Q. So, when you moved to South Carolina,</p> <p>7 you testified that you were not able to bring</p> <p>8 your computer, right?</p> <p>9 A. No, which was why I used my phone.</p> <p>10 Q. Did you get another computer once you</p> <p>11 were in South Carolina?</p> <p>12 A. No.</p> <p>13 Q. Did you use someone else's computer in</p> <p>14 South Carolina?</p> <p>15 A. The only time I used my computer is</p> <p>16 when I went to print stuff off, which was, like,</p> <p>17 rarely, because I didn't -- I didn't need paper</p> <p>18 when I was down there. I didn't need anything</p> <p>19 printed out for me, or whatever. It wasn't like</p> <p>20 I was handing it out to anybody down there.</p> <p>21 So, the only time I had to print</p> <p>22 something off was -- I had some sort of meeting</p> <p>23 where I had to be on the phone and I had to look</p> <p>24 at what I was looking at. So, I couldn't look</p> <p>25 at it while I was on the phone.</p>	<p style="text-align: right;">Page 115</p> <p>1 Q. When was that?</p> <p>2 A. Late -- or early 2017. By the spring,</p> <p>3 summer 2017, I guess.</p> <p>4 Q. So, what computer were you using in</p> <p>5 2017 then?</p> <p>6 A. I wasn't using a computer. What do</p> <p>7 you mean?</p> <p>8 Q. Well, you testified that in 2017 you</p> <p>9 had some kind of meeting where you had to be on</p> <p>10 the phone, that you couldn't look at what was on</p> <p>11 your phone, so you used a computer to print</p> <p>12 something.</p> <p>13 A. That was the neighbor's computer I</p> <p>14 said I used to print something off. I literally</p> <p>15 just -- all I did was plug my phone into her</p> <p>16 computer and send it to the printer, or</p> <p>17 whatever.</p> <p>18 Q. You don't know that neighbor's name?</p> <p>19 A. I don't remember her name at all, no.</p> <p>20 I don't even remember -- I don't remember the</p> <p>21 address we even lived at or anything.</p> <p>22 Q. You don't remember the address that</p> <p>23 you lived at --</p> <p>24 A. No.</p> <p>25 Q. -- in South Carolina?</p>
<p style="text-align: right;">Page 116</p> <p>1 A. I was only there for, like, two or</p> <p>2 three months, then we moved.</p> <p>3 Q. Do you remember anything about where</p> <p>4 you were living in South Carolina?</p> <p>5 A. It was in Greenville. It was on,</p> <p>6 like, a popular road. I don't know. It was on</p> <p>7 a busy road. I don't know.</p> <p>8 Q. Did you ever use anyone else's</p> <p>9 computer or your own computer to -- umm, to send</p> <p>10 e-mails regarding Unite the Right?</p> <p>11 A. To send e-mails, no.</p> <p>12 Q. You did testify that you used an</p> <p>13 internet cafe, right, in Lancaster City to send</p> <p>14 e-mails regarding --</p> <p>15 A. That was to check my e-mails, to see</p> <p>16 if I got anything for this. And I hadn't.</p> <p>17 Q. Have you used anyone else's computer,</p> <p>18 yours or anyone else's, to check your e-mails to</p> <p>19 see if you had gotten e-mails regarding this</p> <p>20 case?</p> <p>21 A. No. Just that one.</p> <p>22 Q. What about your neighbor's computer?</p> <p>23 A. Umm, no. That was -- we left there</p> <p>24 before Unite the Right even happened.</p> <p>25 Q. What about Mr. Spencer's computer?</p>	<p style="text-align: right;">Page 117</p> <p>1 A. Like I said, his computer was always,</p> <p>2 like, out or whatever, I guess, you can say.</p> <p>3 Like, I didn't use it for e-mails or anything</p> <p>4 like that, no. I never signed into my e-mail</p> <p>5 address on his computer or anything, no.</p> <p>6 Q. What about family members' computers?</p> <p>7 A. No.</p> <p>8 Q. Does your sister have a computer, for</p> <p>9 example, that you used?</p> <p>10 A. No.</p> <p>11 Q. What about to send or check social</p> <p>12 media messages regarding Unite the Right? Did</p> <p>13 you ever use anyone's computer to do that?</p> <p>14 A. No, just my cell phone.</p> <p>15 Q. Not a single time you can remember</p> <p>16 using anyone's computer --</p> <p>17 A. No.</p> <p>18 Q. -- to check --</p> <p>19 A. No.</p> <p>20 Q. -- or send messages regarding Unite</p> <p>21 the Right?</p> <p>22 A. No. I always used my phone.</p> <p>23 Q. When you used computers to print</p> <p>24 documents, which documents were those?</p> <p>25 A. I don't remember what they were for.</p>

<p style="text-align: right;">Page 118</p> <p>1 I think it was -- I don't remember what it was 2 for. We had -- we had a phone call and it was 3 about -- might have been about one of Mr. 4 Spencer's speaking engagements. And it might 5 have been about that we were on the phone for. 6 I don't remember exactly what it was. 7 Q. What did you do with the document to 8 get it onto the computer from which you printed 9 it? 10 A. I had it on my phone, my Google drive. 11 I think I -- I don't even -- maybe I didn't even 12 plug it in. I think I had it on my Google 13 drive. I got on the neighbor's computer just to 14 hit print. Just, like, signed -- like, signed 15 in -- I signed in on the account I don't have 16 access to anymore and hit print. 17 Q. I am going to ask you some questions 18 about your e-mail addresses. 19 A. Okay. 20 Q. Now, you have testified that you have 21 used e-mail addresses to discuss Unite the 22 Right, correct? 23 A. Mostly just the court stuff, the court 24 case stuff. 25 Q. Umm --</p>	<p style="text-align: right;">Page 119</p> <p>1 A. I don't think there is any e-mails 2 planning or discussing the actual event. We 3 didn't use e-mail. We used Discord. 4 Q. The e-mail address that would have on 5 it e-mails regarding this case or Unite the 6 Right is Eli.F.Mosley@Gmail.com, correct? 7 A. Yes. And I -- 8 Eli.Mosley@IdentityEvropa. 9 Q. Have you used the e-mail address 10 DeplorableTruth@Gmail.com? 11 A. That is another one, yes. 12 Q. Would that e-mail address contain 13 e-mails regarding Unite the Right or this case? 14 A. No. That is something I used to sign 15 up for, like, free trials and stuff. That is 16 nothing -- 17 Q. So, your testimony is you did not use 18 the e-mail address, quote, 19 DeplorableTruth@Gmail.com to communicate 20 regarding Unite the Right? 21 A. No. 22 Q. Not a single time? 23 A. No. 24 (Exhibit 7, 6/11/2017 Operation Unite 25 the Right Charlottesville 2.0, marked for</p>
<p style="text-align: right;">Page 120</p> <p>1 identification.) 2 BY MR. BARKAI: 3 Q. Mr. Kline, you are being handed a 4 document that's been marked Exhibit 7. 5 Do you recognize this document? 6 A. Yes. This is the planning document 7 that I referenced earlier. 8 Q. This is a planning document regarding 9 Operation Unite the Right Charlottesville 2.0; 10 is that right? 11 A. Correct. 12 Q. Did you write this document? 13 A. Yes. 14 Q. Did anyone else write this document? 15 A. Umm, I believe Jason might have helped 16 me make this. But it was mostly me and maybe 17 him editing it. 18 Q. You wrote this document on your 19 iPhone; is that right? 20 A. I wrote this and I sent it to 21 somebody. I don't remember who I sent it to. 22 And they put it in this format like this. 23 Q. How did you send it to someone else? 24 A. I had it on the Google drive on my 25 phone.</p>	<p style="text-align: right;">Page 121</p> <p>1 Q. But when you say you sent it to 2 someone else, how did you, quote, send it? 3 A. Oh, just send them, like, the share 4 link on Gmail, on Google. 5 Q. So, you e-mailed a share link; is that 6 right? 7 A. No. I hit copy on the link for Gmail, 8 and then pasted it in a Discord message to that 9 person. Then they clicked it and then they 10 opened it and reformatted it in, I guess, Word, 11 or whatever they use. 12 Q. Who is that person to whom you sent 13 it? 14 A. I don't remember who it was. It would 15 be in Discord -- like, in Discord logs, or 16 whatever. It was two years ago. I don't really 17 remember who it was. 18 Q. When Mr. Kessler edited the document, 19 how did he edit it? 20 A. I don't know how much he edited it. I 21 just know I sent these to him before I sent it 22 to anybody else, so he was on the same page. 23 Q. So, when you say that you shared this 24 document with someone else, were you sharing it 25 with Mr. Kessler or with someone aside from Mr.</p>

<p style="text-align: right;">Page 122</p> <p>1 Kessler?</p> <p>2 A. So, this was sent out to everybody</p> <p>3 that was in that Discord, I believe, the Unite</p> <p>4 the Right Discord. So, first I would kind of go</p> <p>5 over what's going on, or, like, the plan or</p> <p>6 whatever. Then I would send -- send it to</p> <p>7 Jason, he would look over it, and be, like, that</p> <p>8 looks fine, or whatever, then I would post it on</p> <p>9 Discord, or have someone post it on Discord.</p> <p>10 Q. When you wrote this document, you</p> <p>11 wrote this as a Google doc on your phone; is</p> <p>12 that right?</p> <p>13 A. Yes. On the Identity Evropa e-mail</p> <p>14 address, I think that is the one this would be</p> <p>15 on. I think so, yeah.</p> <p>16 Q. Did you use any other app on your</p> <p>17 phone to write this?</p> <p>18 A. No. Just the Google docs, or</p> <p>19 whatever.</p> <p>20 Q. Could you please turn to Page 5 of</p> <p>21 this planning document?</p> <p>22 A. Okay.</p> <p>23 Q. Do you see under contact information,</p> <p>24 Eli Mosley - Discord?</p> <p>25 A. Mm-hmm.</p>	<p style="text-align: right;">Page 123</p> <p>1 Q. That sentence?</p> <p>2 A. Yes.</p> <p>3 Q. Do you recognize that as your contact</p> <p>4 information?</p> <p>5 A. Yeah. I see that my Deplorable Truth</p> <p>6 e-mail on there. I don't think I ever got</p> <p>7 anything on there. I think by that time I had</p> <p>8 started using the Identity Evropa e-mail. But I</p> <p>9 don't think I got anything on there. You guys</p> <p>10 can check that e-mail, too. That is still</p> <p>11 active. There is nothing on there.</p> <p>12 Q. You -- you told people on the Discord</p> <p>13 server, quote, feel free to message slash call</p> <p>14 whenever, unquote, correct?</p> <p>15 A. Mm-hmm.</p> <p>16 Q. And you put on this planning document</p> <p>17 DeplorableTruth@Gmail.com, correct?</p> <p>18 A. And out of putting all that contact</p> <p>19 information, still 95 percent or more of all</p> <p>20 communication went to Discord.</p> <p>21 Q. But some communication to you came not</p> <p>22 through Discord, correct?</p> <p>23 A. Umm, the only other noncommunication</p> <p>24 through Discord would have been through Kessler,</p> <p>25 through text messages. But no one used e-mail,</p>
<p style="text-align: right;">Page 124</p> <p>1 and I can't think of a single person who just</p> <p>2 called me out of the blue.</p> <p>3 Q. Your testimony is that you never</p> <p>4 received a single e-mail at</p> <p>5 DeplorableTruth@Gmail.com, despite putting this</p> <p>6 e-mail address here?</p> <p>7 A. I don't think so, no. I can't -- I</p> <p>8 don't remember a single time responding or</p> <p>9 getting a single e-mail from anybody on that --</p> <p>10 on that address.</p> <p>11 Q. When --</p> <p>12 A. Or any address. I don't think I</p> <p>13 e-mailed relating to Unite the Right at all. I</p> <p>14 think all my e-mails have been related to the</p> <p>15 court case stuff.</p> <p>16 Q. Earlier I asked you, have you used the</p> <p>17 e-mail address DeplorableTruth@Gmail.com and you</p> <p>18 agreed that you had. And you said that you used</p> <p>19 that address to sign up for free trials and</p> <p>20 stuff, correct?</p> <p>21 A. Yeah. Like I said, that was a</p> <p>22 throwaway e-mail. That is why I put it there,</p> <p>23 because I wasn't intending to use it after or</p> <p>24 anything, you know what I mean? Because I knew</p> <p>25 -- I figured this kind of stuff would get out,</p>	<p style="text-align: right;">Page 125</p> <p>1 right. Like, this document would get leaked,</p> <p>2 and things like that. So, I used my throwaway</p> <p>3 e-mail address to put on there so people didn't</p> <p>4 contact me.</p> <p>5 Like I said, I don't think I have</p> <p>6 gotten anything on that e-mail address about</p> <p>7 Unite the Right.</p> <p>8 Q. But you did put forward that e-mail</p> <p>9 address --</p> <p>10 A. Yes, correct.</p> <p>11 Q. -- as an e-mail address that people</p> <p>12 could use to talk to you --</p> <p>13 A. Yes.</p> <p>14 Q. -- about Unite the Right, correct?</p> <p>15 A. So, nobody -- like I said, I don't</p> <p>16 think I got any communication from it.</p> <p>17 Like I said, I have -- this is one of</p> <p>18 the few accounts I still have access to, I</p> <p>19 haven't been banned from. So, you guys are more</p> <p>20 than welcome to go through that. There is</p> <p>21 nothing in there that is -- there is nothing in</p> <p>22 there that is part of this case though.</p> <p>23 Q. Have you deleted any e-mails from</p> <p>24 DeplorableTruth@Gmail.com?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 126</p> <p>1 Q. Not a single time?</p> <p>2 A. No.</p> <p>3 THE VIDEOGRAPHER: Pardon me, Counsel.</p> <p>4 About three minutes until I have to change over</p> <p>5 the tape.</p> <p>6 MR. BARKAI: So, we'll go for another</p> <p>7 couple minutes, then we'll take a break.</p> <p>8 THE WITNESS: Yeah.</p> <p>9 BY MR. BARKAI:</p> <p>10 Q. You still have access to</p> <p>11 DeplorableTruth@Gmail.com, right?</p> <p>12 A. Yes.</p> <p>13 Q. And you still have access to</p> <p>14 Eli.F.Mosley@Gmail.com?</p> <p>15 A. Yes.</p> <p>16 Q. You also have an IdentityEvropa.com</p> <p>17 e-mail address, correct?</p> <p>18 A. I do not have access to.</p> <p>19 Q. Do you have any other e-mail addresses</p> <p>20 that you have used in the last four years?</p> <p>21 A. Yeah. Umm, the only other -- well,</p> <p>22 there is two things for that. The first thing</p> <p>23 is I have an e-mail address that is used, like,</p> <p>24 that I signed up for a lot of stuff, like, bank</p> <p>25 accounts and things like that. I have that</p>	<p style="text-align: right;">Page 127</p> <p>1 e-mail address. Umm, that is at Comcast</p> <p>2 address. Again, there is nothing in there.</p> <p>3 That is what I sign up for accounts for, like I</p> <p>4 said, banking and things like that.</p> <p>5 And then the other e-mail address is</p> <p>6 when I would make a new Twitter account or</p> <p>7 whatever, when I needed a new Twitter account, I</p> <p>8 would just have a random e-mail address I don't</p> <p>9 have any access to at all. It would be random</p> <p>10 letters, if that makes sense.</p> <p>11 Q. Are you able to log into those e-mail</p> <p>12 addresses?</p> <p>13 A. I don't even -- no. They have all</p> <p>14 been deleted. All -- Twitter deleted -- Twitter</p> <p>15 somehow got -- Twitter had, like, a way of just</p> <p>16 knowing it was me and they started deleting them</p> <p>17 right away. So --</p> <p>18 Q. Have you used anyone else's e-mail</p> <p>19 address to communicate --</p> <p>20 A. No.</p> <p>21 Q. -- about Unite the Right?</p> <p>22 A. No.</p> <p>23 Q. Does Identity Evropa have its own</p> <p>24 e-mail addresses --</p> <p>25 A. Yeah.</p>
<p style="text-align: right;">Page 128</p> <p>1 Q. -- for the organization?</p> <p>2 A. Yes.</p> <p>3 Q. Have you operated those e-mail</p> <p>4 addresses?</p> <p>5 A. No. I wasn't ever in control of any</p> <p>6 of the tech stuff.</p> <p>7 Q. Have you deleted any e-mails at all</p> <p>8 that you have sent or received concerning the</p> <p>9 events in this case?</p> <p>10 A. No.</p> <p>11 Q. Have you ever been instructed to</p> <p>12 delete any such e-mails?</p> <p>13 A. No.</p> <p>14 Q. Have you ever instructed anyone else</p> <p>15 to delete any such e-mails?</p> <p>16 A. No.</p> <p>17 MR. BARKAI: We can take a break. Go</p> <p>18 off the record.</p> <p>19 THE VIDEOGRAPHER: The time is 12:04</p> <p>20 p.m., we are going off the video record.</p> <p>21 (Recess was taken.)</p> <p>22 THE VIDEOGRAPHER: The time is now</p> <p>23 12:13 p.m., we are back on the video record.</p> <p>24 BY MR. BARKAI:</p> <p>25 Q. Mr. Kline, before we continue</p>	<p style="text-align: right;">Page 129</p> <p>1 discussing your communications regarding Unite</p> <p>2 the Right, a few questions about your</p> <p>3 preparation for this deposition.</p> <p>4 In preparation for this deposition,</p> <p>5 did you speak to Mr. DiNucci, who is on the</p> <p>6 phone?</p> <p>7 A. No.</p> <p>8 Q. Did you speak with Mr. Campbell, who</p> <p>9 is on the phone, in preparation for this</p> <p>10 deposition?</p> <p>11 A. No.</p> <p>12 Q. What about regarding this case</p> <p>13 generally? Have you had conversations with Mr.</p> <p>14 DiNucci?</p> <p>15 A. No, I don't think so. Outside of --</p> <p>16 no, actually I don't think I have ever talked to</p> <p>17 him before. I mostly talked with Kaplan, I</p> <p>18 think.</p> <p>19 Q. You started to say outside of, have</p> <p>20 you ever had any conversations with Mr. DiNucci</p> <p>21 about this case?</p> <p>22 A. No, I don't think so.</p> <p>23 Q. What about Mr. Campbell? Have you had</p> <p>24 conversations with Mr. Campbell about this case?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 166</p> <p>1 Q. Can you name a single person you told 2 that your account had been hacked? 3 A. I mean, I probably told Richard, I 4 probably told -- I don't know. Other people. I 5 don't know. Whoever I was with at the time. 6 Q. Richard, does that refer to Mr. 7 Spencer? 8 A. Yeah, yeah. 9 Q. You have used the account EliMosleyIE 10 on Twitter, right? 11 A. Yes. 12 Q. Have you used Eli_Mosley_? 13 A. Uh, Yes. 14 Q. Have you used Sheli_Shmosley? 15 A. Yes. 16 Q. Have you used Eli Mosley? 17 A. Yes. 18 Q. Have you used Eli Mosley is Back? 19 A. Yes. 20 Q. Have you used EliMosleyOH? 21 A. Umm -- oh, yes. 22 Q. Have I named -- excuse me. Are there 23 any other Twitter usernames besides the 24 usernames that I have named that you have used? 25 A. I am sure there are, but not that I</p>	<p style="text-align: right;">Page 167</p> <p>1 remember the names of. There are more 2 transformations of Eli and Eli Mosley or 3 whatever. But none that I remember. 4 Q. There are other Twitter usernames that 5 feature the name Eli Mosley in some form? 6 A. I am sure there are. But, like I 7 said, I don't know what they would be. As you 8 can see, that list -- you can't differentiate 9 between one or the other usually. So, it is 10 kind of hard to remember them all. 11 Q. You had a password for each Twitter 12 account, right? 13 A. Uh, Yes. 14 Q. Did anyone else have those passwords? 15 A. No. 16 Q. Did anyone else use your Twitter 17 accounts? 18 A. No. 19 Q. So, would you agree that the messages 20 posted on Twitter were posted by you? 21 A. Yes. Except for the Not Eli Mosley 22 account. 23 Q. Other than the Not Eli Mosley account, 24 which you have testified was hacked, would you 25 agree that the messages posted on Twitter under</p>
<p style="text-align: right;">Page 168</p> <p>1 each of the other usernames were posted by you? 2 A. Yes. 3 Q. Which device did you use to post 4 messages on Twitter? 5 A. My iPhone. 6 Q. Did you ever use anything aside from 7 your iPhone? 8 A. No. 9 Q. Now, you told the Court that you did 10 not sign up for Twitter with your real e-mail 11 address, but that you used burner e-mails, 12 right? 13 A. Yes. I don't even know -- go ahead. 14 Q. What is a burner e-mail? 15 A. You can go on, like, a website and 16 say, hey, I need an e-mail address to confirm an 17 account. And they'll give you like random 18 letters and numbers together, and they'll say 19 here, this is going to be an e-mail for ten 20 minutes. And then you sign up for the Twitter 21 account or whatever it is, you get your 22 activation code, put it in. Then that e-mail, 23 you just don't ever use it again. 24 So, it is -- like I said, it is like a 25 burner phone, but for an e-mail.</p>	<p style="text-align: right;">Page 169</p> <p>1 Q. You told the Court that the burner 2 e-mails were, quote, not real e-mail addresses? 3 A. Correct. 4 Q. When you were referring to, quote, 5 real e-mail addresses, are there any others 6 besides the ones we discussed today, 7 Eli.F.Mosley@Gmail.com, 8 DeplorableTruth@Gmail.com, and your Identity 9 Evropa e-mail address? 10 A. No. 11 Q. Those are the only three you have? 12 A. Correct. 13 Q. Does Identity Evropa have its own 14 Twitter account? 15 A. I don't believe it does anymore. I 16 think it did at one point. 17 Q. Did you administer that Twitter 18 account? 19 A. No. 20 Q. You told the Court that you were, 21 quote, more than happy to go through with the 22 process so that Twitter could hand over 23 information to the Court, right? 24 A. Yes. 25 Q. You haven't actually executed anything</p>

<p style="text-align: right;">Page 174</p> <p>1 it would have been Not Eli Mosley.</p> <p>2 Q. So, that was the Twitter account that</p> <p>3 you had at the time of Unite the Right, correct?</p> <p>4 A. Correct, yes. So, this other one was</p> <p>5 from two months before. Clearly my account was</p> <p>6 banned. Not Eli Mosley would be the new one.</p> <p>7 Q. You have no active account on Twitter</p> <p>8 right now; is that true?</p> <p>9 A. No, I haven't had one for probably two</p> <p>10 years, or a year-and-a-half.</p> <p>11 Q. Do you see the top of this version of</p> <p>12 the operational documents, which is Exhibit 8,</p> <p>13 do you see the sentence this version of the</p> <p>14 document is to only be shared in extremely</p> <p>15 vetted circles, do not post on social media?</p> <p>16 A. Yes.</p> <p>17 Q. What were the extremely vetted circles</p> <p>18 in which this document was shared?</p> <p>19 A. Well, looking back, that is kind of a</p> <p>20 joke. It was meant to be logistical.</p> <p>21 MR. DiNUCCI: Note my objection from</p> <p>22 earlier based on Judge Hoppe's Order. Thank</p> <p>23 you.</p> <p>24 BY MR. BARKAI:</p> <p>25 Q. You may answer.</p>	<p style="text-align: right;">Page 175</p> <p>1 A. It was just the, umm -- it was just</p> <p>2 Discord, is what it meant. Discord was supposed</p> <p>3 to have people vetted before they could join it.</p> <p>4 So, that is what I was talking about.</p> <p>5 Q. How is the document shared within</p> <p>6 Discord?</p> <p>7 A. Just post it. Like you would on</p> <p>8 Facebook or -- just put it in a channel.</p> <p>9 Q. Who posted it?</p> <p>10 A. Umm, maybe me. But I don't know.</p> <p>11 Like I said, the way I made these, is I made</p> <p>12 them on Google drive and I sent them to somebody</p> <p>13 usually. I don't remember who each one. Some</p> <p>14 -- each one was different. They would format it</p> <p>15 like this. Then either they would post it, or I</p> <p>16 would -- they would send it back to me and I</p> <p>17 would post it.</p> <p>18 Q. How many versions of this document did</p> <p>19 you make?</p> <p>20 A. Umm, probably five or six. And they</p> <p>21 were all posted in Discord.</p> <p>22 Q. You made five or six versions of this</p> <p>23 document?</p> <p>24 A. Yes.</p> <p>25 Q. This document is several pages long,</p>
<p style="text-align: right;">Page 176</p> <p>1 correct?</p> <p>2 A. Yes.</p> <p>3 Q. This document appears to be nine pages</p> <p>4 long, right?</p> <p>5 A. Yeah. The final one was really long.</p> <p>6 Yeah.</p> <p>7 Q. The final version was very long?</p> <p>8 A. Yes.</p> <p>9 Q. You typed out these very long</p> <p>10 documents on your phone?</p> <p>11 A. Yes. It was mostly editing old stuff</p> <p>12 and changing it out. It wasn't like I made it</p> <p>13 all at once. It was, oh, I dealt with this part</p> <p>14 of this, let me type this part up. And then,</p> <p>15 you know, save another document, or whatever.</p> <p>16 Oh, I fixed -- this part needs to be done. It</p> <p>17 was kind of, like, a living document, I guess</p> <p>18 you could say.</p> <p>19 Q. So, you had one version of the</p> <p>20 document that you edited?</p> <p>21 A. Yes, yes.</p> <p>22 Q. You did not create multiple documents?</p> <p>23 A. Correct.</p> <p>24 Q. And, again, you did all this on your</p> <p>25 phone?</p>	<p style="text-align: right;">Page 177</p> <p>1 A. Yes.</p> <p>2 Q. When you -- strike that.</p> <p>3 At the top of this page, Page 1 of</p> <p>4 Exhibit 8, do you see reported version</p> <p>5 8/10/2017, general orders?</p> <p>6 A. Yes.</p> <p>7 Q. What are general orders?</p> <p>8 A. Just like the general -- the way</p> <p>9 people were supposed to behave and act at the</p> <p>10 thing, which basically no one followed, as most</p> <p>11 people can tell. This thing clearly outlines</p> <p>12 that people aren't supposed to be violent and</p> <p>13 that -- basically this whole document wasn't</p> <p>14 followed from the beginning to end.</p> <p>15 Q. You also used Facebook to communicate</p> <p>16 about Unite the Right, correct?</p> <p>17 A. Yes.</p> <p>18 Q. Which is -- what is your Facebook</p> <p>19 username?</p> <p>20 A. I was banned from Facebook as well,</p> <p>21 and I don't know what the name of the account or</p> <p>22 -- is it -- I think Facebook is saved by e-mail</p> <p>23 address, if I am not mistaken. But I don't know</p> <p>24 what e-mail address I would have been using.</p> <p>25 Q. Would it have been</p>

<p style="text-align: right;">Page 214</p> <p>1 events --</p> <p>2 A. Yes.</p> <p>3 Q. -- in the Complaint?</p> <p>4 Turning to Page 5 of Exhibit No. 10,</p> <p>5 please. Do you see Paragraph G at the bottom of</p> <p>6 that page?</p> <p>7 A. Yes.</p> <p>8 Q. Do you see that Paragraph G states</p> <p>9 whether or not you object, you must preserve all</p> <p>10 documents and communications relevant to the</p> <p>11 lawsuit, including all documents and</p> <p>12 communications responsive to these requests?</p> <p>13 A. Yep.</p> <p>14 Q. Have you read that before?</p> <p>15 A. Uh, not here on this page. But I</p> <p>16 think there was another one where I did read,</p> <p>17 like, that you can't dispose of or get rid of</p> <p>18 anything, which is why I kept the phone and all</p> <p>19 that other stuff.</p> <p>20 Q. Did your attorney speak to you</p> <p>21 about --</p> <p>22 A. Yes.</p> <p>23 Q. -- that requirement?</p> <p>24 A. Yes.</p> <p>25 Q. Was that Mr. Kolenich?</p>	<p style="text-align: right;">Page 215</p> <p>1 A. Yes.</p> <p>2 Q. When did he speak to you about that</p> <p>3 requirement?</p> <p>4 A. When I first started working with him.</p> <p>5 So, probably before this was even sent out. So,</p> <p>6 before January 2018.</p> <p>7 Q. Would that have been in October of</p> <p>8 2017?</p> <p>9 A. Yeah, probably.</p> <p>10 Q. You were instructed to preserve all</p> <p>11 documents, right?</p> <p>12 A. Yes.</p> <p>13 Q. Do you understand that that means you</p> <p>14 are obligated to keep all documents and</p> <p>15 communications relevant to the case?</p> <p>16 A. Yes.</p> <p>17 Q. Do you understand that you are</p> <p>18 obligated not to delete anything?</p> <p>19 A. Yes.</p> <p>20 Q. Not to delete anything relevant to the</p> <p>21 case, that is?</p> <p>22 A. Yes.</p> <p>23 Q. Have you taken any steps to make sure</p> <p>24 that all documents and communications relative</p> <p>25 to the lawsuit are preserved?</p>
<p style="text-align: right;">Page 216</p> <p>1 A. Well, I kept my cell phone when it was</p> <p>2 broken, and I fixed it when it was broken. Umm,</p> <p>3 but that is really the only thing I have -- any</p> <p>4 information I can retrieve, other than the</p> <p>5 social media accounts.</p> <p>6 Q. You have never backed up any of your</p> <p>7 documents to a separate device, right?</p> <p>8 A. No, no.</p> <p>9 Q. You never turned on any kind of cloud</p> <p>10 back up?</p> <p>11 A. No.</p> <p>12 Q. You never made any screen shots of any</p> <p>13 of your messages?</p> <p>14 A. No.</p> <p>15 Q. You never forwarded any of your</p> <p>16 messages to anyone else?</p> <p>17 A. No.</p> <p>18 Q. Did you ever make any copies of any of</p> <p>19 the information relevant to Unite the Right?</p> <p>20 A. No.</p> <p>21 Q. Did you store your broken iPhone in</p> <p>22 any kind of secure location?</p> <p>23 A. No.</p> <p>24 Q. Did you store your Walmart phone in</p> <p>25 any kind of secure location?</p>	<p style="text-align: right;">Page 217</p> <p>1 A. No.</p> <p>2 Q. Your iPhone was water damaged, right?</p> <p>3 A. Correct.</p> <p>4 Q. How did that water damage occur?</p> <p>5 A. I think it was literally raining one</p> <p>6 night and I was outside, coming home. And it</p> <p>7 was in my back pocket and it got wet.</p> <p>8 Q. On Page 8 of this Exhibit No. 10, do</p> <p>9 you see the Request for Production No. 1</p> <p>10 requests all documents and communications</p> <p>11 concerning the events?</p> <p>12 A. Yes.</p> <p>13 Q. Do you see there is a list of</p> <p>14 different types of documents and communications</p> <p>15 which are included as examples?</p> <p>16 A. Yes.</p> <p>17 Q. Do you understand that you are</p> <p>18 obligated to produce to Plaintiffs all documents</p> <p>19 and communications you have in your possession</p> <p>20 concerning the events?</p> <p>21 A. Yes.</p> <p>22 Q. And you have at various times had</p> <p>23 documents and communications concerning the</p> <p>24 events, right?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 218</p> <p>1 Q. You have never produced any of those 2 to Plaintiffs, right? 3 A. No. But I would like to, using the 4 PDF or whatever you guys have that looks like 5 from this e-mail. 6 Q. You are ready to do that today? 7 A. Yes. 8 Q. You are ready to turn over your 9 devices -- 10 A. Umm -- 11 Q. -- for imaging? 12 A. I could turn the -- I would like to 13 not do the cell phone today, just because I use 14 it to get home on GPS. I have somewhere to go 15 that I am not familiar with. But I could, like, 16 do it right after I get home and activate the 17 new cell phone I just got. 18 Q. You are ready to provide consents for 19 social media accounts -- 20 A. Yes. 21 Q. -- to be disclosed? 22 A. Yes. 23 Q. Did you ever at any time have 24 documents and communications relevant to the 25 events in the Complaint that you no longer have?</p>	<p style="text-align: right;">Page 219</p> <p>1 A. No. 2 Q. Do you see Request for Production No. 3 2 at the bottom of Page 8 of this document? 4 A. Number -- okay, I see that, yes. 5 Q. Do you see that it asks there for you 6 to produce all documents and communications 7 concerning events, meetings, rallies, 8 conferences, or conversations held prior to the 9 events that relate to the events in any way? 10 A. Yeah. 11 Q. Do you understand you are obligated to 12 produce all such documents to Plaintiffs? 13 A. Yep. 14 Q. And you have at various times had 15 documents and communications concerning such 16 events, right? 17 A. Yes. And it is all in my phone, or 18 Discord. 19 Q. You haven't produced any of those yet, 20 have you? 21 A. No. But I would like to today, if 22 that is possible. Or consent for the social 23 media ones today. 24 Q. On Page 9 of this document, do you see 25 Request for Production No. 3 --</p>
<p style="text-align: right;">Page 220</p> <p>1 A. Yes. 2 Q. -- which asks for documents concerning 3 and communications with various groups? 4 A. Yes. 5 Q. Did you understand that you are 6 obligated to produce all documents and 7 communications you have concerning or with these 8 groups? 9 A. Yes. 10 Q. Do you have, or have you had in the 11 past documents concerning or communications 12 concerning or with East Coast Knights of the 13 KKK? 14 A. No. 15 Q. What about Fraternal Order of the Alt 16 Knights? 17 A. No. 18 Q. Identify Evropa you do, correct? 19 A. Yes. 20 Q. What about League of the South? 21 A. Umm, yes, on Discord. 22 Q. What about Loyal White Knights of the 23 KKK? 24 A. No. 25 Q. What about Moonbase Holdings, LLC?</p>	<p style="text-align: right;">Page 221</p> <p>1 A. I don't know what that is. No. 2 Q. What about Nationalist Socialist 3 Movement? 4 A. No. 5 Q. What about Nationalist Front? 6 A. No. 7 Q. What about Traditionalist Worker 8 Party? 9 A. Yes. 10 Q. What about Vanguard America? 11 A. Yes. 12 Q. With respect to Traditionalist Worker 13 Party, what sorts of documents are those? 14 A. Just communication between us on 15 Discord. 16 Q. Between you and who? 17 A. Umm, it wasn't -- it wasn't Matt 18 Heimbach at the time, it was somebody else I was 19 dealing with. I can't remember his name. I 20 can't remember the guy's name. But it was 21 somebody that was on Discord. They were, like, 22 the -- they were marked as the communication 23 liaison for the Traditionalist Worker Party. 24 Q. What about Vanguard America? 25 A. I spoke to one or two guys. One of</p>

<p style="text-align: right;">Page 222</p> <p>1 them became the new leader. I can't remember 2 his name. Umm, it is not -- it is not -- it is 3 not the guy that I was on the phone with the 4 other day. Umm, it is -- what's his name? 5 What's the current -- Hopper. Mr. Hopper. It 6 was not Mr. Hopper, it was somebody else from 7 Vanguard America. 8 Then just somebody I knew, umm, that 9 was from Texas from Vanguard America. I don't 10 remember who it was. I just know they were from 11 Texas. 12 Q. Did you communicate with Thomas Russo? 13 A. Yes. That's who I'm talking about. 14 Q. How did you communicate with Mr. 15 Russo? 16 A. Uh, on Discord mostly. And I also had 17 his phone number. And I think I texted him 18 afterwards or whatever, just saying hey, like. 19 And I think it was just, like, a hi thing. 20 Q. You exchanged text messages with Mr. 21 Russo? 22 A. Yes. But it was very brief. I think 23 it was one sided. I think I messaged him, he 24 never messaged me back. 25 Q. Did you communicate with Mr. Russo</p>	<p style="text-align: right;">Page 223</p> <p>1 before Unite the Right occurred? 2 A. Briefly, yes. 3 Q. You stated earlier in your testimony 4 that you were on the phone with a guy the other 5 day? 6 A. What do you mean? 7 Q. Earlier in your testimony a minute ago 8 you stated -- 9 A. Just now? 10 Q. Just now, a minute ago -- 11 A. When we were on the phone, the guy I 12 was on the phone with, Mr. Hopper. I couldn't 13 remember his name. We were on the phone on -- 14 talking about discovery and stuff. 15 Q. You spoke with Mr. Hopper on the phone 16 about discovery stuff? 17 A. No. What I was saying was when we 18 were on the phone talking with me, Heimbach, and 19 Hopper, that was the -- it wasn't him, is what I 20 was saying. It wasn't Hopper that I talked to 21 before, it was Mr. Russo. 22 Q. You are referring to the Court call? 23 A. Yes. 24 Q. Do you have Mr. Russo's phone number? 25 A. I don't know. Maybe. I don't think</p>
<p style="text-align: right;">Page 224</p> <p>1 so. Maybe. I don't know. I have no idea. I 2 should still have it. 3 Q. You exchanged -- you spoke with him on 4 the phone, right? 5 A. Yeah, yeah. I mean, I have a text 6 message exchange with him. But that doesn't -- 7 so, I guess I have his phone. But I don't know 8 if that is his current number or anything like 9 that. 10 Q. Can you provide Plaintiffs with that 11 number? 12 A. Yeah. 13 Q. When we go off the record, we'll ask 14 you to do that. 15 A. Well, I mean, can't you guys just get 16 that when you do the discovery stuff? 17 Q. Umm -- 18 A. Won't that come up in discovery? 19 Q. Do you see on Page 9 of this document, 20 Request for Production No. 4? 21 A. Yeah. 22 Q. Do you see that requests all the 23 documents and communications concerning 24 violence, intimidation, or harassment of persons 25 on basis of race, religion, or ethnicity?</p>	<p style="text-align: right;">Page 225</p> <p>1 A. Yes. 2 Q. Then the sentence continues, including 3 but not limited to certain examples? 4 A. Yes. 5 Q. Do you understand you are obligated to 6 produce all such documents and communications 7 that you have? 8 A. Yes. 9 Q. Do you have any such documents? 10 A. No. Other than what's in Discord. 11 But those are on the Discord servers. 12 Q. Do you see Request for Production No. 13 5 on this page? 14 A. Yes. 15 Q. Do you see that the Request for 16 Production seeks uses of social media that 17 reference or concern the events or Defendants? 18 A. Yes. 19 Q. Do you understand that you are 20 obligated to produce such messages to 21 Plaintiffs? 22 A. Yes. 23 Q. You have made such messages in the 24 past, correct? 25 A. Yes.</p>

<p style="text-align: right;">Page 242</p> <p>1 don't know -- like, just give a list of all the 2 people I have talked to about the events? It 3 doesn't make sense to me. But -- 4 Q. What does not make sense to you about 5 giving a list of people with whom you 6 communicated? 7 A. Right. Like, I understand that is 8 something I need to do, right. So, is that 9 going to be in this PDF I got sent, a spot to 10 list all the people? 11 Q. Are you prepared to identify the 12 persons with whom you communicated now? 13 A. Yes. 14 Q. But you haven't done it before? 15 A. No, but I would like to. 16 Q. Have you communicated concerning the 17 events, whether before, during, or after the 18 events, with Jason Kessler? 19 A. Yes. 20 Q. Erika Alduino? 21 A. Yes. 22 Q. Richard Spencer? 23 A. Yes. 24 Q. Christopher Cantwell? 25 A. Yes.</p>	<p style="text-align: right;">Page 243</p> <p>1 Q. James Alex Fields, Jr.? 2 A. No. 3 Q. Andrew Anglin? 4 A. No. 5 Q. Robert Azzmador Ray? 6 A. Yes. 7 Q. Nathan Damingo? 8 A. Yes. 9 Q. Matthew Heimbach? 10 A. Yes. 11 Q. Matthew Parrott? 12 A. No. 13 Q. Michael Hill? 14 A. Uh, no. 15 Q. Michael Tubbs? 16 A. No. 17 Q. Jeff Schoep? 18 A. No. 19 Q. Augustus Sol Invictus? 20 A. Yes. 21 Q. Michael Peinovich? 22 A. Yes. 23 Q. Identify -- is there anyone else with 24 whom you communicated concerning the events, 25 whether before, during, or after them?</p>
<p style="text-align: right;">Page 244</p> <p>1 A. No, not -- no. 2 Q. Not a single person? 3 A. I mean, I have talked to people about 4 it, obviously. But, like, I talked about, like, 5 hey, this crazy thing happened, or whatever. I 6 don't know -- like, everyone I have communicated 7 with. I mean, that is a list of thousands of 8 people. 9 Q. You have not made a list of people you 10 communicated with concerning the events, have 11 you? 12 A. No, but I can. I can make a list of 13 the people I have communicated with concerning 14 the events. I mean, more than half of them I 15 won't even know their real names. Most people 16 operate anonymously. I can give pseudonyms or 17 fake names or whatever that they use if I 18 remember them. But -- 19 Q. Do you understand Interrogatory No. 3 20 is asking you to identify all those persons? 21 A. Yes. And I would be fine with doing 22 that. Like I said, it is going to be a 23 difficult task. 24 Q. Do you see Interrogatory No. 4, that 25 asks you to identify all electronic devices used</p>	<p style="text-align: right;">Page 245</p> <p>1 by you to communicate concerning the events, 2 whether before, during, or after the events? 3 A. Yes. 4 Q. You have not done that in the past, 5 have you? 6 A. No, but I would like to. I have my 7 cell phone ready to do that. Not today. But 8 literally, like, tomorrow or even tonight I 9 would send it out. It doesn't matter. 10 Q. You understand that this Interrogatory 11 asks you to identify all electronic devices that 12 you used, even if you no longer use them, right? 13 A. Yes. 14 Q. Do you understand that this 15 Interrogatory asks you to identify all 16 electronic devices that you used, even if they 17 did not belong to you? 18 A. Yes. 19 Q. For example, if you borrowed someone 20 else's phone, that would be included, right? 21 A. Yes. 22 Q. So, Mr. Spencer's computer, for 23 example, would be included if you used it to 24 communicate concerning the events, right? 25 A. Correct.</p>

<p style="text-align: right;">Page 282</p> <p>1 Q. sca@bsflp --</p> <p>2 A. bsflp --</p> <p>3 Q. .com.</p> <p>4 A. .com, okay. That is it?</p> <p>5 Q. Yes.</p> <p>6 A. All right.</p> <p>7 Q. Could you also just reply to the</p> <p>8 e-mail as well from Mr. Bloch?</p> <p>9 A. Mm-hmm.</p> <p>10 Q. And just say you received it. You can</p> <p>11 just type in the word received.</p> <p>12 A. This e-mail address -- okay. So, just</p> <p>13 for your information, the Gab account that I</p> <p>14 have is signed up -- is on the Deplorable Truth</p> <p>15 e-mail. It says my last log in was two years</p> <p>16 ago. So, I just haven't -- like, I am just</p> <p>17 going through the e-mails right now. That is</p> <p>18 what I have.</p> <p>19 The Deplorable Truth one is literally</p> <p>20 -- like, it is my spot -- it is, like, Spotify,</p> <p>21 Hulu, PayPal, stuff. You know what I mean? It</p> <p>22 is not really a lot of Alt-Right stuff. Like I</p> <p>23 said, I use that e-mail like that on the</p> <p>24 document because I -- I didn't think anyone was</p> <p>25 going to use it anyway.</p> <p style="text-align: right;">Page 284</p> <p>1 than the list you guys have of the account</p> <p>2 names.</p> <p>3 Q. The issue with the e-mail addresses is</p> <p>4 that they were, quote, burner e-mails; is that</p> <p>5 right?</p> <p>6 A. Yes, yes. It is random letters and</p> <p>7 numbers at whatever website.</p> <p>8 Q. Was there any Twitter account that you</p> <p>9 created using an e-mail address that was not a</p> <p>10 burner e-mail address?</p> <p>11 A. Not that I recall, no.</p> <p>12 Q. Never a Twitter account that was</p> <p>13 created using Eli.F.Mosley?</p> <p>14 A. I don't believe so, no.</p> <p>15 Q. Or --</p> <p>16 A. I have to go back and check. If I</p> <p>17 did, it would have been way, way long ago.</p> <p>18 Q. And never a Twitter account associated</p> <p>19 with the e-mail address</p> <p>20 DeplorableTruth@Gmail.com?</p> <p>21 A. No, I don't think I would have made a</p> <p>22 Twitter account with that one.</p> <p>23 Q. Are you willing to complete this form</p> <p>24 to the best of your ability, even if you don't</p> <p>25 remember all --</p>	<p style="text-align: right;">Page 283</p> <p>1 Q. Thank you, Mr. Kline. We received</p> <p>2 that.</p> <p>3 A. So, just to be clear then, that is</p> <p>4 basically telling Discord that they can send</p> <p>5 over all the stuff that deals with that account.</p> <p>6 And then I believe I got one from Twitter, I</p> <p>7 think, at one point. But I can't remember.</p> <p>8 (Exhibit 16, Twitter consent form,</p> <p>9 marked for identification.)</p> <p>10 THE WITNESS: This is going to be the</p> <p>11 issue with this one. I remember when I saw</p> <p>12 this, that was an issue. It is asking for,</p> <p>13 like, username and e-mail addresses. But I</p> <p>14 don't know either, outside the list of usernames</p> <p>15 you guys have.</p> <p>16 BY MR. BARKAI:</p> <p>17 Q. Mr. Kline, you are referring to</p> <p>18 Exhibit 16; is that right?</p> <p>19 A. Correct.</p> <p>20 Q. You recognize this to be a consent to</p> <p>21 disclose data from Twitter; is that right?</p> <p>22 A. Correct.</p> <p>23 Q. You are willing to fill this out?</p> <p>24 A. Yes. But, like I said, I don't know</p> <p>25 the e-mail addresses or the account names, other</p> <p style="text-align: right;">Page 285</p> <p>1 A. If I could just e-mail a list -- you</p> <p>2 guys had that list earlier of all my Twitter</p> <p>3 accounts that you guys had, that you guys knew</p> <p>4 of. That is the best list I have seen of ones I</p> <p>5 would remember, from what I would remember.</p> <p>6 Q. When we go off the record, we'll ask</p> <p>7 you to complete the Twitter form to the best of</p> <p>8 your ability.</p> <p>9 Are you prepared to do that?</p> <p>10 A. That's fine. Yeah.</p> <p>11 Q. You said earlier, Mr. Kline, that you</p> <p>12 were prepared to turn over all of your</p> <p>13 electronic devices for imaging, right?</p> <p>14 A. Yes. Just not tonight, because I have</p> <p>15 to use the GPS to get somewhere. But after</p> <p>16 that, yeah.</p> <p>17 Q. But you are -- are you prepared to</p> <p>18 today identify all of your electronic devices?</p> <p>19 A. Yes. It is my phone. I don't --</p> <p>20 there is nothing else that I would have used.</p> <p>21 Q. Are you prepared today to identify all</p> <p>22 of your social media accounts that may contain</p> <p>23 potentially relevant documents?</p> <p>24 A. Yes.</p> <p>25 (Exhibit 17, social media and</p>

<p style="text-align: right;">Page 302</p> <p>1 Q. You also missed the e-mail in Exhibit 2 11, right -- 3 A. Yes. 4 Q. -- that we had looked at earlier? 5 A. That one is after I had been 6 contacted. That was the one that the Judge had 7 said are you -- do you see that paper, and I 8 said yes. I was looking at a different one that 9 was sent to me that day instead of the one the 10 day before. Because that one, Exhibit 11, was 11 from July 1, the day before the phone call. 12 Q. You testified earlier that you had -- 13 you had missed messages from the Court regarding 14 your court hearing, right? 15 A. I believe so. Maybe. I don't know. 16 For what? 17 Q. You testified earlier that you check 18 your voicemails, right? 19 A. Yes. 20 Q. And that the 610 phone number is the 21 correct phone number? 22 A. Yes. 23 Q. And Eli.F.Mosley@Gmail.com is the 24 correct e-mail address? 25 A. Yes.</p>	<p style="text-align: right;">Page 303</p> <p>1 Q. You testified earlier that you agreed 2 that it appeared to you that the Court had been 3 attempting to reach you regarding your upcoming 4 court hearings, right? 5 A. Yes. 6 Q. Do you have any explanation as to why 7 you did not receive those messages? 8 A. I just -- I have -- I started 9 receiving messages -- or I started noticing 10 these messages were for me, or whatever, for the 11 hearing for me after I talked with Patrick 12 Casey. And then we had the July 2 phone call. 13 Q. Were you -- 14 A. Before that, I didn't realize that -- 15 I didn't know these -- I didn't know that there 16 was actions I needed to take. I thought I was 17 good. 18 Q. Did you receive this e-mail, Mr. 19 Kline, or did you not? 20 A. What, this? 21 Q. Exhibit 21. 22 A. Exhibit 21. I mean, obviously it says 23 -- it says it was sent to me. But I don't 24 recognize it. 25 Q. Do you not recognize it because you</p>
<p style="text-align: right;">Page 304</p> <p>1 didn't read it at the time when it came into 2 your inbox? 3 A. I am not sure. I don't have access to 4 my inbox right now to look and see if it was 5 read or not. I assume I looked at this. The 6 subject is Sines versus Kessler, so I assume I 7 saw it. 8 Like I said, I did not know back in 9 May there was a motion against me. I didn't 10 know that. 11 Q. This is an e-mail about that motion, 12 right? 13 A. Right. I didn't know that was a 14 thing. 15 Q. The e-mail was informing you that 16 there was a motion about you in effect, right? 17 A. Correct. Like I said, I didn't know 18 -- I didn't know that until Patrick Casey called 19 me several weeks after this, or a couple weeks 20 after this. 21 Q. But this e-mail was in advance of the 22 hearing and in advance of when Mr. Casey talked 23 to you, and this e-mail is about that motion, 24 right? 25 A. Right. That is what I am saying. I</p>	<p style="text-align: right;">Page 305</p> <p>1 didn't find out from this e-mail, I found out 2 from Casey, from Patrick Casey. 3 Q. If you had read this e-mail, this 4 e-mail would have revealed to you that there was 5 a hearing coming up on your motion, right? 6 A. Right. But what I am saying is, I 7 don't remember reading this or seeing this. So, 8 if I would have read it, I would have known that 9 it was -- I would have known there was a motion 10 against me. Like I said, I didn't know that. I 11 didn't know that was a thing. 12 Patrick Casey called me, what, a week 13 or two after this. So, like I said, I just 14 didn't know there was a motion against me. 15 Q. When exactly did Mr. Casey call you? 16 A. Probably a week or two before the July 17 2 call. Maybe -- maybe even a little longer 18 than that. Maybe three weeks, a month. I am 19 not entirely sure. 20 Q. You -- during this time was anyone 21 informing you of your obligations in discovery? 22 A. No. 23 Q. Were -- well, were you in touch with 24 Mr. Kolenich at all? 25 A. Patrick Casey told -- Patrick Casey</p>

<p style="text-align: right;">Page 306</p> <p>1 told me to call Mr. Kolenich and get in touch 2 with him. And he essentially said that I am 3 going to have to get on a call with you guys and 4 the Court and work out how to fix the discovery 5 issues. And that was, like, the extent of our 6 conversation. That was the first time I had 7 spoken to him for awhile. 8 (Exhibit 22, 6/26/2019 e-mail 9 exchange, marked for identification.) 10 BY MR. BARKAI: 11 Q. You are being handed a document marked 12 Exhibit 22. I would like you to turn to the 13 second page of this document. Do you see an 14 e-mail from James Kolenich on June 7, 2019 to 15 Michael Bloch regarding Eli Mosley? 16 A. Umm, no. You mean this part right 17 here? Yeah, okay. I see it. You said the 18 second page? 19 Q. On the second page there is an e-mail 20 from Mr. Kolenich to Mr. Bloch -- 21 A. Yes. 22 Q. -- regarding you? 23 A. Yes. 24 Q. This e-mail states the word arrest has 25 had a near magical effect on my former client.</p>	<p style="text-align: right;">Page 307</p> <p>1 Eli Mosley, Elliott Kline, can be reached at 2 (610) 406-2229. He reached out to IE upon 3 seeing a news article referencing the arrest 4 discussion in court. You can text that number 5 or call him. He has been fully informed of the 6 discovery/ESI -- 7 A. He knows Patrick Casey called me. So, 8 I mean, that is just wrong. He knows Patrick 9 Casey called me. 10 Q. Mr. Kolenich is wrong about this? 11 A. 100 percent. Patrick Casey called me 12 and informed me of what was going on. And I 13 read a news article about what was going on, and 14 then I called Mr. Kolenich. That is how I knew 15 about the news article that he is referencing. 16 Because in the news article the Judge had -- it 17 said right in the news article the Judge was 18 talking about possible arrests. And I said -- 19 so I asked Mr. Kolenich, I said, I didn't know 20 any of this was going on. Like, how did -- you 21 didn't inform me, or no one informed me, and I 22 read it in the news. So, that is what he is 23 referencing in the e-mail. 24 But Patrick Casey is the one who 25 called me and reached out to me about what was</p>
<p style="text-align: right;">Page 308</p> <p>1 going on. Before that, I thought that 2 everything was going -- going on. And I was 3 still waiting for you guys to try to get my 4 phone, which I was just sitting on, waiting for 5 you guys to take -- or get the image of. 6 And I thought -- like I said, at the 7 time I thought the Discord and the Twitter stuff 8 was taken care of. Or at least the Discord 9 stuff. I wasn't sure about the Twitter stuff. 10 Q. So, you told Mr. Kolenich that you 11 didn't know any of this was going on, even 12 though there had been e-mails and calls to you 13 about your attendance at hearings, right? 14 A. Right. Like I said, I didn't know 15 those hearings were hearings for me. Like, if I 16 saw them. Most of them I don't think I saw 17 though. I didn't know they were for me. 18 Q. You told Mr. Kolenich that you didn't 19 know any of this was going on, even though there 20 had been -- 21 A. I didn't know the motions were filed 22 against me. 23 Q. Do we have your permission to ask Mr. 24 Kolenich about this? 25 A. Ask him what?</p>	<p style="text-align: right;">Page 309</p> <p>1 Q. Do we have permission to ask Mr. 2 Kolenich about your conversations that are 3 referenced in the June 7 e-mail? 4 A. I mean, I have -- I'll show you right 5 now that Patrick Casey called me. 6 THE VIDEOGRAPHER: Can we go off the 7 record for a second? 8 MR. BARKAI: Sure. We are going off 9 the record. 10 THE VIDEOGRAPHER: Time is 3:48 p.m., 11 going off the video record. 12 (Recess was taken.) 13 THE VIDEOGRAPHER: The time is now 14 3:56 p.m., we are back on the video record. 15 BY MR. BARKAI: 16 Q. Mr. Kline, before we took a break you 17 had testified that you were going to show us 18 where the -- where in the call log Patrick Casey 19 called you regarding the hearing before the 20 Court, right? 21 A. Correct. 22 Q. Were you able to find that? 23 A. No. My phone calls only go back to -- 24 until July. Like, the beginning of July. So, 25 it doesn't go back that far.</p>

<p style="text-align: right;">Page 354</p> <p>1 A. I -- I recognize -- I don't recognize 2 the name at all. But, yeah, I mean, I see 3 someone named Jessica Phillips sent me 4 something. I just didn't recognize the name. 5 Q. Who were you house-sitting for on July 6 15? 7 A. My cousin. 8 Q. What is your cousin's name? 9 A. Aaron Ward. 10 Q. Aaron Ward? 11 A. Yeah. 12 Q. Where does he live? 13 A. Macungie. 14 Q. What is Macungie? 15 A. It is a town called Macungie. 16 Q. How long were you house-sitting for? 17 A. Like, a week-and-a-half, two weeks. 18 Q. What is his address? 19 A. I don't know off the top of my head. 20 Q. You don't know the address where you 21 were house-sitting for a week-and-a-half or two 22 weeks? 23 A. No, because I didn't leave the house. 24 I was basically watching the dogs. 25 Q. Did you receive any calls or e-mails</p>	<p style="text-align: right;">Page 355</p> <p>1 regarding a conference call tomorrow, August 8? 2 A. Yes. 3 Q. Who called you or e-mailed you? 4 A. Umm, I don't know. I have a voicemail 5 I just checked that was done this morning while 6 we were in here. And I haven't checked the 7 e-mail. 8 Q. You have one voicemail? 9 A. I have a voicemail, and then -- I saw 10 I had an e-mail. I just haven't looked at it 11 yet. 12 Q. Who is the e-mail from? 13 A. I -- I have no idea. Umm, umm, it is 14 from -- there is no way that is right. 15 Q. What are you doing right now? 16 A. Like, the last -- the last e-mail I 17 have, it says, is from 6/11. But that is not -- 18 Q. On your phone -- the last e-mail on 19 your phone -- 20 A. This is obviously wrong. Like, 6/11 21 is not the earliest e-mail I have. 22 Q. What is -- 23 A. Do you see what I am saying? 24 Q. The earliest e-mail on your phone is 25 from June 11?</p>
<p style="text-align: right;">Page 356</p> <p>1 A. It is trying -- that is what I am 2 saying. It is trying to set -- I have already 3 received that e-mail. I have seen it. But I am 4 saying the newest one it is showing is wrong. 5 So, I don't know who sent me the 6 newest e-mail. 7 Q. The newest e-mail on your phone is 8 from June 11? 9 A. No. What I am saying is that right 10 now, when I looked at it, it is showing June 11. 11 Earlier when we took our break, when I was going 12 through, I saw I had two missed -- I had new 13 e-mails from today. 14 Q. You had two e-mails from today? 15 A. The other one might have been from 16 yesterday. But definitely one from today. 17 Q. Who sent you the e-mails from today or 18 yesterday? 19 A. I don't know. I didn't get to look at 20 them yet. I definitely have a phone call from 21 somebody telling me, umm, the code for the 22 conference call tomorrow. 23 Q. You said just now in your testimony 24 that the earliest e-mail on your phone right now 25 is June 11. You also said that the latest</p>	<p style="text-align: right;">Page 357</p> <p>1 e-mail on your phone is June 11. 2 Could you please clarify? 3 A. Right now when I am going onto my 4 phone, it is showing June 11 is the newest 5 e-mail I have. However, earlier when we took a 6 break I had seen what e-mails I received today 7 and it showed I received e-mails today. So, 8 there is something wrong with the phone. 9 Q. You can't see those e-mails now? 10 A. The ones from today are not showing 11 up, no. I mean, we have documents here that are 12 from later date than 6/11. So, I mean, and you 13 can see it. I am not -- you can see 6/11 is the 14 latest. It is not letting me -- you see this? 15 It is not -- 16 Q. Did your phone just ask you to enter 17 the password for Eli.F.Mosley@Gmail.com? 18 A. Yes. That is the same thing it does 19 for the, umm -- the same thing it does for the 20 Identity Evropa account as well. 21 Q. Are you not logged into your Gmail 22 account? 23 A. I am definitely logged into the Gmail 24 account. I just sent the e-mail to you guys 25 from it.</p>

<p style="text-align: right;">Page 358</p> <p>1 Q. You sent an e-mail to us from 2 DeplorableTruth@Gmail.com. 3 A. Did I? Maybe I have to re-sign into 4 Eli F. Mosley. I definitely received an e-mail 5 earlier today. 6 Q. Are you not logged into your 7 Eli.F.Mosley@Gmail.com account on your phone 8 right now? 9 A. I believe I am. I mean, I am able to 10 go into my inbox. Why wouldn't -- how would I 11 be able to go to the inbox if I wasn't logged 12 in? 13 Q. The last e-mail in your 14 Eli.F.Mosley@Gmail.com inbox appearing on your 15 phone is from June 11, right? 16 A. Yeah. 17 Q. Do e-mails just disappear from your 18 phone periodically? 19 A. I mean, that is strange. I don't know 20 what's going on with it. Like I said, earlier I 21 had a pop-up that an e-mail showed up. 22 Q. My question was, do e-mails just 23 disappear from your phone periodically? 24 A. No. 25 Q. Do texts disappear from your phone</p>	<p style="text-align: right;">Page 359</p> <p>1 periodically? 2 A. No. 3 Q. What is the oldest 4 Eli.F.Mosley@Gmail.com e-mail on your -- in your 5 inbox? 6 A. 9/21/18. 7 Q. So, right now your Gmail -- 8 A. That it is showing. I don't know -- 9 maybe it is -- maybe it goes back further. I 10 don't know. 11 Q. So, on your phone right now your 12 Eli.F.Mosley@Gmail.com e-mail address displays 13 e-mails from September 21, 2018 to June 11, 14 2019, right? 15 A. Correct. But I am pretty sure I had 16 the account before that, and I have obviously 17 gotten e-mails after that. 18 Q. You are pretty sure you had the 19 account before that? 20 A. Yeah, I am pretty sure I had the 21 account before that. Probably 2017. Like I 22 said, it just might be what the phone is 23 displaying right now. 24 Q. But you -- your password needs to be 25 entered into your phone right now?</p>
<p style="text-align: right;">Page 360</p> <p>1 A. I just entered it again. It kicked me 2 right back out. 3 Q. You entered your password and it 4 kicked you out? 5 A. Well, when I entered the password, it 6 asked for the Identity Evropa e-mail password. 7 That is what I told you before, when they wrote 8 me out of Identity Evropa e-mail, service, it 9 messed with the e-mail on my phone. 10 Q. After you entered your password for 11 your Eli.F.Mosley@Gmail.com account, did the 12 rest of the e-mails for that account show up? 13 A. No. A pop-up came up, said sign into 14 Eli.Mosley@IdentityEvropa.com. And I can't. If 15 I hit sign in or yes, it says this account 16 doesn't exist and takes me right back to where I 17 was. 18 Q. You did enter your password for your 19 Gmail account, right? 20 A. Correct. And the next question it 21 asked me was the account information for the 22 Identity Evropa e-mail, which I no longer can 23 get into. 24 Q. Your e-mails for your Gmail account 25 are still stopped at June 11?</p>	<p style="text-align: right;">Page 361</p> <p>1 A. Yeah. But I have been receiving all 2 these other things. So, like I said, I don't 3 know what is going on with it. Maybe when I get 4 my -- you know, my new phone, when I activate my 5 new phone, it'll fix it, or whatever. 6 Q. How have you been receiving them? 7 A. I am receiving them on that phone, is 8 what I am telling you. 9 Q. Where are they now then? 10 A. I don't know. I don't understand what 11 is going on with the phone. 12 Q. They just disappeared? 13 A. It is clearly a broken phone. It is 14 clearly, like, a messed up phone. 15 Q. It is a messed up phone? 16 A. I mean, the phone I have already 17 explained to you guys has had issues. 18 Q. It has had issues, right? 19 A. Yeah. But it hasn't lost any, like, 20 data or anything like that. It is still full. 21 Q. But the e-mails are not showing up 22 right now, right? 23 A. No. But I know I have those e-mails. 24 Because, like I said, I have received them 25 before. I have looked at them on that phone.</p>

<p style="text-align: right;">Page 362</p> <p>1 Q. You have looked at them on your phone?</p> <p>2 A. Yes.</p> <p>3 Q. And since then, now they are not able</p> <p>4 to be viewed?</p> <p>5 A. No, but I am sure they are still in</p> <p>6 the inbox. It is not like I went through -- I</p> <p>7 didn't go through and delete the e-mails, or</p> <p>8 whatever.</p> <p>9 (Exhibit 29, 8/6/2019 e-mail exchange,</p> <p>10 marked for identification.)</p> <p>11 BY MR. BARKAI:</p> <p>12 Q. You are being handed a document marked</p> <p>13 Exhibit 29. Now, you had testified earlier that</p> <p>14 you had received some e-mails and voicemails</p> <p>15 regarding a court hearing tomorrow, right?</p> <p>16 A. Yes.</p> <p>17 Q. You couldn't remember who sent them to</p> <p>18 you?</p> <p>19 A. Correct.</p> <p>20 Q. And you couldn't remember how many you</p> <p>21 received?</p> <p>22 A. No.</p> <p>23 Q. And when you looked for them on your</p> <p>24 phone, you couldn't find them, right?</p> <p>25 A. The voicemails? No, I have it.</p>	<p style="text-align: right;">Page 363</p> <p>1 Q. Also e-mails?</p> <p>2 A. Well, right now my phone is not</p> <p>3 showing any e-mails. But, like, this is from</p> <p>4 August 6, so it is not showing for whatever</p> <p>5 reason. I can see the voicemail on my phone.</p> <p>6 Q. Do your voicemails get sent to your</p> <p>7 e-mails?</p> <p>8 A. No.</p> <p>9 Q. Excuse me, do your voicemails get sent</p> <p>10 to your e-mail address?</p> <p>11 A. No.</p> <p>12 Q. They are just accessible through your</p> <p>13 phone?</p> <p>14 A. Correct.</p> <p>15 Q. Do you recognize the e-mails in this</p> <p>16 exhibit?</p> <p>17 A. 29, yes.</p> <p>18 Q. Correct. You do recognize these?</p> <p>19 A. Yes.</p> <p>20 Q. What are they?</p> <p>21 A. They are e-mails asking me what time</p> <p>22 and day I can do this -- I can do the next call.</p> <p>23 Q. Did you receive this e-mail from</p> <p>24 KarenD@vawd.uscourts.gov on August 22, 2019, at</p> <p>25 12:24 p.m.?</p>
<p style="text-align: right;">Page 364</p> <p>1 A. Yes. That is not when I read it. I</p> <p>2 read it little bit after that. But, yes.</p> <p>3 Q. You did receive it?</p> <p>4 A. Yes.</p> <p>5 Q. Do you see when Miss Dotson asks, what</p> <p>6 time works best for you and I'll get the call</p> <p>7 set up?</p> <p>8 A. Uh, yes.</p> <p>9 Q. Did you respond to her?</p> <p>10 A. Umm, I don't know if I did or not.</p> <p>11 But I think -- no, I don't think I responded to</p> <p>12 her. But I definitely seen this e-mail.</p> <p>13 I think by the time I saw this -- yes,</p> <p>14 that's what it is. The next e-mail is three</p> <p>15 days later, and I didn't see that e-mail until</p> <p>16 she had already sent back that'll take place at</p> <p>17 3:30. So, by that time I didn't respond to her,</p> <p>18 because I didn't realize -- or I -- you know,</p> <p>19 the time was already set and that is a fine time</p> <p>20 for me.</p> <p>21 Q. You did not respond to Mrs. Dotson's</p> <p>22 e-mail because you didn't see it until August 5,</p> <p>23 2019 when Mr. Bloch sent the e-mail?</p> <p>24 A. Correct.</p> <p>25 Q. Do you see where Mr. Bloch told Miss</p>	<p style="text-align: right;">Page 365</p> <p>1 Dotson, we reached out to Mr. Kline on Friday</p> <p>2 regarding this conference call, we have not</p> <p>3 received any response?</p> <p>4 A. Yes, I see that.</p> <p>5 Q. Is that wrong?</p> <p>6 A. I mean, I guess. I -- I don't know</p> <p>7 who we would be. The only person that called me</p> <p>8 or that would have called me would be -- I guess</p> <p>9 that is from you guys. But I don't know -- is</p> <p>10 it 929 is the number up there? I don't -- I</p> <p>11 don't recognize anyone calling me from that</p> <p>12 number.</p> <p>13 Q. You have not received a phone call --</p> <p>14 A. The only --</p> <p>15 Q. -- from a number beginning 929; is</p> <p>16 that right?</p> <p>17 A. No. The numbers that I am receiving</p> <p>18 -- the calls I am receiving from are -- are 540</p> <p>19 numbers, which are Virginia.</p> <p>20 Q. What about an e-mail from Mr. Bloch?</p> <p>21 Did you receive an e-mail from Mr. Bloch?</p> <p>22 A. Yeah. But it was after they had</p> <p>23 already confirmed the time and date.</p> <p>24 Q. It was this e-mail here?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 366</p> <p>1 Q. You did not receive an e-mail before</p> <p>2 this e-mail about the time and date of this</p> <p>3 conference?</p> <p>4 A. I didn't see it, no.</p> <p>5 Q. You didn't see it?</p> <p>6 A. No. I mean, like I said, they sent</p> <p>7 this to me August 2. I must have checked my</p> <p>8 e-mail on the fifth. And when I -- they had</p> <p>9 already approved the time. So, I was okay.</p> <p>10 Q. Did you not see an e-mail from Mr.</p> <p>11 Bloch because your phone does not have any</p> <p>12 messages on it after June 11?</p> <p>13 A. No, I don't think so. Because, like I</p> <p>14 said, I had opened that up today earlier and it</p> <p>15 was -- it was working. It was showing the</p> <p>16 e-mails I was getting today and yesterday.</p> <p>17 MR. BARKAI: Let's take a break.</p> <p>18 THE WITNESS: Okay.</p> <p>19 MR. BARKAI: We'll go off the record</p> <p>20 for a few minutes.</p> <p>21 THE VIDEOGRAPHER: Time is 4:54 p.m.,</p> <p>22 we are going off the video record.</p> <p>23 (Recess was taken.)</p> <p>24 THE VIDEOGRAPHER: The time is now</p> <p>25 5:04 p.m., we are back on the video record.</p>	<p style="text-align: right;">Page 367</p> <p>1 (Exhibit 30, text messages, marked for</p> <p>2 identification.)</p> <p>3 BY MR. BARKAI:</p> <p>4 Q. Mr. Kline, you are being handed a</p> <p>5 document that is being marked Exhibit 30.</p> <p>6 Do you recognize this document?</p> <p>7 A. No -- there are messages. I don't</p> <p>8 know who they are between.</p> <p>9 Q. Do you see at the very top of Page 1,</p> <p>10 Eli Mosley +1 (610) 406-2229 at the very top of</p> <p>11 Page 1?</p> <p>12 A. Yes.</p> <p>13 Q. Is that your phone number?</p> <p>14 A. Yes.</p> <p>15 Q. Is that your alias that you have used</p> <p>16 in the past?</p> <p>17 A. Yes.</p> <p>18 Q. Are these your text messages?</p> <p>19 A. Yes. I assume so, yes.</p> <p>20 Q. These are your text messages?</p> <p>21 A. Yes.</p> <p>22 Q. Were these text messages with Erika</p> <p>23 Alduino, to your recollection?</p> <p>24 A. Yeah. I mean, I don't know who these</p> <p>25 -- I have to read through all these to see who</p>
<p style="text-align: right;">Page 368</p> <p>1 they are with. But it is kind of formatted</p> <p>2 strangely.</p> <p>3 I mean, this is me, right? And this</p> <p>4 is somebody else. I don't know who this is.</p> <p>5 And this is Erika, and this is me, this is</p> <p>6 Erika. And who is this? Do we know who this</p> <p>7 is?</p> <p>8 Q. Do you see at the bottom of Page 1 the</p> <p>9 question, Jason, is that your 434 number?</p> <p>10 A. Oh, okay. This is a group text.</p> <p>11 Okay. That makes more sense. Okay, yes.</p> <p>12 Q. Does that refresh your recollection</p> <p>13 that this was a conversation that you had over</p> <p>14 text with Erika Alduino --</p> <p>15 A. Yes.</p> <p>16 Q. -- and Jason Kessler?</p> <p>17 A. Yes.</p> <p>18 Q. Do you see on Page 1 where you said</p> <p>19 please just trust me -- this is the top of Page</p> <p>20 1 -- please just trust me that I am taking care</p> <p>21 of everything that needs to be done. We have</p> <p>22 two months and don't need to rush this. I am</p> <p>23 doing this full time and can handle it.</p> <p>24 A. Yeah, I see that.</p> <p>25 Q. What did you mean, I am doing this</p>	<p style="text-align: right;">Page 369</p> <p>1 full-time?</p> <p>2 A. Umm, well, two things. First of all,</p> <p>3 did you un-mute the phone for those guys? And</p> <p>4 isn't this supposed to be about the discovery</p> <p>5 stuff? And this seems more about the case.</p> <p>6 Q. The phone is not muted. As I said at</p> <p>7 the outset, even if there are objections, you</p> <p>8 are still required to answer my questions.</p> <p>9 A. Okay. So, what was your question</p> <p>10 again?</p> <p>11 Q. The question was, what did you mean</p> <p>12 when you told Jason Kessler and Erika Alduino, I</p> <p>13 am doing this full-time and can handle it?</p> <p>14 A. I didn't have a job at the time, so I</p> <p>15 was trying to get as much stuff organized as I</p> <p>16 possibly could.</p> <p>17 Q. Was organizing Unite the Right a</p> <p>18 full-time job for you?</p> <p>19 A. I mean, not hours or pay, no. But</p> <p>20 that is what I was doing.</p> <p>21 Q. It was the only thing you were doing?</p> <p>22 A. Yes.</p> <p>23 Q. On Page 2 of this text message</p> <p>24 conversation, do you see where you told Erika</p> <p>25 Alduino and Jason Kessler, I am putting together</p>

<p style="text-align: right;">Page 370</p> <p>1 this document now and will send it to you guys</p> <p>2 after it is done?</p> <p>3 A. Yes.</p> <p>4 Q. Does that refer to the same</p> <p>5 operational document of which we have seen</p> <p>6 copies before?</p> <p>7 A. I imagine so. I mean, I don't know</p> <p>8 for sure. But I imagine that is what it is.</p> <p>9 Because there is no other types of documents I</p> <p>10 put together.</p> <p>11 Q. Did you send planning documents to</p> <p>12 Jason Kessler and Erika Alduino?</p> <p>13 A. Both on Discord, yes.</p> <p>14 Q. You send them --</p> <p>15 A. The copy paste, or the -- I'm sorry,</p> <p>16 the link for G -- like, Google docs, or</p> <p>17 whatever.</p> <p>18 Q. You sent the link via Discord?</p> <p>19 A. Yes.</p> <p>20 Q. Did you share the documents with</p> <p>21 anyone else?</p> <p>22 A. After it was done -- I mean, I don't</p> <p>23 know which one they are talking about here. But</p> <p>24 usually when I was done sending it to those</p> <p>25 guys, then we would post it on the Discord. So,</p>	<p style="text-align: right;">Page 371</p> <p>1 like, everyone can see it, or whatever.</p> <p>2 Q. How many versions of that document</p> <p>3 existed?</p> <p>4 A. Like I said, it was kind of, like, a</p> <p>5 living document. So, there is no really way to</p> <p>6 say, like, if something changed day-to-day. I</p> <p>7 would edit it. Then once a week I would send it</p> <p>8 to these guys, make sure they knew what was</p> <p>9 going on.</p> <p>10 Q. You sent the documents to Mr. Kessler</p> <p>11 and Miss Alduino once a week?</p> <p>12 A. Uh, I mean, not -- sometimes it was</p> <p>13 every other week, depending on how close it was</p> <p>14 to the event, or every three weeks, or whatever</p> <p>15 it was.</p> <p>16 Q. Did you send the documents to other</p> <p>17 people?</p> <p>18 A. It was post -- whenever there was a</p> <p>19 document, it was posted on Discord.</p> <p>20 Q. Did you send the documents to other</p> <p>21 people also approximately once a week or once</p> <p>22 every other week?</p> <p>23 A. It is -- like I said, at the beginning</p> <p>24 when we first started planning it, it was maybe</p> <p>25 once every three weeks. Then towards -- closer</p>
<p style="text-align: right;">Page 372</p> <p>1 we got to the day of the event, it was, like,</p> <p>2 every week, you know, or every couple days --</p> <p>3 every couple days I would send one out.</p> <p>4 Every time I had one, I would post it</p> <p>5 on Discord.</p> <p>6 Q. You have in front of you Exhibit 7,</p> <p>7 right? Exhibit 7 is a --</p> <p>8 A. Oh, yeah.</p> <p>9 Q. -- is what we have discussed before as</p> <p>10 the planning document?</p> <p>11 A. Yes. This is one version.</p> <p>12 Q. This is one version?</p> <p>13 A. Yeah. Like I said, it was a living</p> <p>14 document that kept going. This is one of the</p> <p>15 earlier versions. This might be the version</p> <p>16 from what they are talking about here. Umm, I</p> <p>17 don't know what the date is on this though.</p> <p>18 Q. Do you see on Page 1 of this document</p> <p>19 that the date is June 11, 2017?</p> <p>20 A. Yeah, okay. Perfect. This is June</p> <p>21 11, and this one is June 7. So, yeah, that</p> <p>22 makes sense.</p> <p>23 Q. On Page 4 of this document, do you see</p> <p>24 the sentence --</p> <p>25 A. Which one?</p>	<p style="text-align: right;">Page 373</p> <p>1 Q. Page 4 of Exhibit 7, about halfway</p> <p>2 down the page. This report states there will be</p> <p>3 two different reports like this every week</p> <p>4 leading up to the event where it will switch to</p> <p>5 every day.</p> <p>6 A. That ended up being not accurate.</p> <p>7 That was the original intention. But we didn't</p> <p>8 need to send that out as often as that.</p> <p>9 Q. But you still sent it out frequently;</p> <p>10 is that right?</p> <p>11 A. Yes. Like I said, just like this</p> <p>12 says, the closer we got to the event, the more</p> <p>13 frequent I sent them out.</p> <p>14 Q. And this document states the first</p> <p>15 version will be for leadership and Alt-Right</p> <p>16 groups. The second version will be for the</p> <p>17 general attendees and Alt-Right/New Right</p> <p>18 groups?</p> <p>19 A. Yes.</p> <p>20 Q. So, there were two versions?</p> <p>21 A. Again, that was something that was</p> <p>22 originally planned. But the -- I mean, this</p> <p>23 was, what, like, two months before the event.</p> <p>24 There ended up only ever being one version.</p> <p>25 Q. There ended up only ever being one?</p>

<p style="text-align: right;">Page 374</p> <p>1 A. Yes.</p> <p>2 Q. But on different dates you created</p> <p>3 other versions, right?</p> <p>4 A. Umm, yes. So, there is -- there is</p> <p>5 one of these -- like, there is one in here for</p> <p>6 6/11. There is another one that got posted</p> <p>7 probably two or three weeks after this. It was</p> <p>8 posted in Discord.</p> <p>9 Q. Were there two versions on June 11?</p> <p>10 A. No, no.</p> <p>11 Q. Only one version on June 11?</p> <p>12 A. Yeah, I don't think I ever did two</p> <p>13 versions, if I remember correctly. If I did,</p> <p>14 again, both versions would be posted, right.</p> <p>15 So, one of the channels in the Discord was</p> <p>16 leadership, where only leaders had access to, I</p> <p>17 guess. And it would have been posted there for,</p> <p>18 like, a leadership one, if I did that. But I</p> <p>19 don't think I ever did that. I think I --</p> <p>20 originally that was the plan, but we ended up</p> <p>21 not doing that.</p> <p>22 Q. You stated you created a living</p> <p>23 document that you edited on an ongoing basis,</p> <p>24 right?</p> <p>25 A. Mm-hmm.</p>	<p style="text-align: right;">Page 375</p> <p>1 Q. Did you have multiple living</p> <p>2 documents?</p> <p>3 A. No. It was just one -- it was</p> <p>4 literally just one -- one document the whole</p> <p>5 time.</p> <p>6 Q. Do you see at the top of this document</p> <p>7 on all pages it states, this version of the</p> <p>8 document is to only be shared by and with group</p> <p>9 leaders. Do not share with other attendees.</p> <p>10 Another version will be released for them?</p> <p>11 A. Yes. This is something on this one,</p> <p>12 like I said, on the earlier version, these</p> <p>13 versions, that was the intention, umm, was to</p> <p>14 have multiple versions. We ended up -- I don't</p> <p>15 think doing that anymore.</p> <p>16 MR. BARKAI: Let's go off the record</p> <p>17 just for a moment.</p> <p>18 THE VIDEOGRAPHER: The time is 5:12</p> <p>19 p.m., we are going off the video record.</p> <p>20 (A discussion off of the record took</p> <p>21 place.)</p> <p>22 THE VIDEOGRAPHER: The time is now</p> <p>23 5:13 p.m., we are back on the video record.</p> <p>24 BY MR. BARKAI:</p> <p>25 Q. Mr. Kline, you described that the</p>
<p style="text-align: right;">Page 376</p> <p>1 intent was to have multiple versions on a given</p> <p>2 date, but you ended up with only one version on</p> <p>3 each given date; is that right?</p> <p>4 A. Yeah, I believe. Yes, yes. That's</p> <p>5 how I believe we went through that. But like I</p> <p>6 said, if it ended up changing, and we -- or if I</p> <p>7 ended up doing two versions, they would be both</p> <p>8 on Discord.</p> <p>9 Q. All versions of this document would be</p> <p>10 on Discord?</p> <p>11 A. Yes. Every iteration of this document</p> <p>12 would be on Discord, on the server.</p> <p>13 Q. Would the document be anywhere else?</p> <p>14 A. No.</p> <p>15 Q. You created this document on your</p> <p>16 phone?</p> <p>17 A. Yes.</p> <p>18 Q. Only ever on your phone?</p> <p>19 A. Yes.</p> <p>20 Q. You never used any -- any other device</p> <p>21 to make this document?</p> <p>22 A. No.</p> <p>23 (Exhibit 31, Discord messages from Eli</p> <p>24 Mosley in Charlottesville, marked for</p> <p>25 identification.)</p>	<p style="text-align: right;">Page 377</p> <p>1 BY MR. BARKAI:</p> <p>2 Q. You are being handed a document that's</p> <p>3 been marked Exhibit 31.</p> <p>4 Do you recognize what this is?</p> <p>5 A. One second. I guess these are Discord</p> <p>6 excerpts.</p> <p>7 Q. Do you see messages here under the --</p> <p>8 under the name Eli Mosley?</p> <p>9 A. Yes.</p> <p>10 Q. Do you recognize those messages as</p> <p>11 yours?</p> <p>12 A. Yes.</p> <p>13 Q. Could you please turn to Page 6?</p> <p>14 A. They are not labeled. Is it this one?</p> <p>15 I think it is the same. Okay.</p> <p>16 Q. Do you see a message on that page from</p> <p>17 Eli Mosley?</p> <p>18 A. Yes.</p> <p>19 Q. Is this a message that you posted?</p> <p>20 A. Yeah.</p> <p>21 Q. Does this appear to be accurate?</p> <p>22 A. Yes.</p> <p>23 Q. Do you see that you asked for one</p> <p>24 representative from each group to jump on a</p> <p>25 meeting?</p>

<p style="text-align: right;">Page 386</p> <p>1 A. No. Because at that point what we did 2 is a lot of the groups had taken over their -- 3 so, you know, the groups were sent, okay, you 4 are going to be in this order, or whatever. Now 5 you take care of your own thing, your own 6 transportation, or whatever it was. A lot of 7 the groups did -- a lot of them were doing it 8 themselves.</p> <p>9 But the -- the collection of people 10 threatening the whole rally, or whatever, was 11 many, many people and putting -- putting it into 12 some -- one person put it together. I just 13 don't know who sent it in.</p> <p>14 Q. It was a list of many, many people, 15 right?</p> <p>16 A. I would say probably 20 people, yeah. 17 25 people that were threatening the rally.</p> <p>18 Q. Did you work on that list on a 19 computer?</p> <p>20 A. No.</p> <p>21 Q. Did you work on that list on a phone?</p> <p>22 A. I didn't work on -- all I did was -- I 23 looked through the list. I didn't actually put 24 together the list.</p> <p>25 Q. When you -- when you looked through</p>	<p style="text-align: right;">Page 387</p> <p>1 the list, how did you look through the list?</p> <p>2 A. It was on a Google doc, and I just 3 skimmed through it. I just scrolled through and 4 I saw, oh, I know this person, oh, I know that 5 person.</p> <p>6 Q. Who shared the Google doc with you?</p> <p>7 A. Umm, I might have put it together and 8 posted it in one of the channels and said, hey, 9 if you see people threatening the rally, post 10 the information here and we'll get it to the 11 police.</p> <p>12 Q. You might have put together the Google 13 doc?</p> <p>14 A. I think I just posted the Google doc 15 and people put it -- it was, like, a public 16 Google doc. You know what I mean? I think that 17 is how I made it.</p> <p>18 Q. And how did you --</p> <p>19 A. Or how I -- I shared it, or whatever 20 got done.</p> <p>21 Q. How did you post the Google doc? With 22 what device?</p> <p>23 A. On my phone.</p> <p>24 Q. You don't remember who sent that to 25 the police?</p>
<p style="text-align: right;">Page 388</p> <p>1 A. No. Like I said, I am not entirely 2 sure, but I want to say it was somebody from 3 League of the South, maybe, that was talking to 4 the police about that. But I don't remember who 5 it was that ended up being the person that 6 handed it off to the police.</p> <p>7 There was a lot of other stuff. That 8 was just one of the things.</p> <p>9 Q. But you are not able to testify 10 definitively that it was not you, right? You 11 thought you might have been the person who sent 12 it?</p> <p>13 A. It might have been me, it might have 14 been somebody else. But all I know is that -- I 15 did not send it to the police. I know that. I 16 know I did not -- I wasn't the one who sent it 17 to the police. I know that.</p> <p>18 But as far as putting the list 19 together, it was either me making a Google doc 20 and throwing it in a chat and people just making 21 it -- kind of, like, a lot of people together 22 making it, or some -- one person taking it upon 23 themselves to put it together. I just don't 24 remember how it was done.</p> <p>25 Q. Mr. Kline, you testified earlier that</p>	<p style="text-align: right;">Page 389</p> <p>1 you only had one phone in 2017, right?</p> <p>2 A. 2017. Yeah, I think 2018 is when I 3 got the Walmart phone. I think it was 2018 when 4 I got that.</p> <p>5 Q. The -- so, yes, you had one phone in 6 2017?</p> <p>7 A. Correct.</p> <p>8 Q. That phone you had in 2017 was your 9 personal phone, right?</p> <p>10 A. Correct.</p> <p>11 Q. It was your iPhone, right?</p> <p>12 A. Correct.</p> <p>13 Q. It was your iPhone with the 610 14 number, right?</p> <p>15 A. Yes.</p> <p>16 Q. That is the number that you have here 17 with you now?</p> <p>18 A. Correct.</p> <p>19 Q. Mr. Kline, isn't it true that you had 20 three phones in 2017?</p> <p>21 A. I don't believe so.</p> <p>22 Q. You had one phone for work in 2017?</p> <p>23 A. I am not sure I am following the 24 question.</p> <p>25 Q. Isn't it true that you had one phone</p>

<p style="text-align: right;">Page 390</p> <p>1 for work in 2017, and one for personal in 2017, 2 and one for the Alt-Right? 3 A. I am not sure. I don't think that is 4 accurate. I think I only ever had this phone. 5 I had a work phone before I got fired from my 6 job, but it wasn't a cell phone. It was just my 7 phone at work, my extension. 8 Q. So, is it your testimony, Mr. Kline, 9 that you did not have, in 2017, one phone for 10 work, one phone for personal matters, and one 11 phone for the Alt-Right matters? 12 A. I don't think that is accurate, no. 13 (Exhibit 33, 3/31/2017 Discord chat, 14 marked for identification.) 15 BY MR. BARKAI: 16 Q. You have been handed a document marked 17 Exhibit 33. 18 Do you see that? 19 A. Yes. I just don't know what I am 20 looking at. 21 Q. Those are Discord chats, right? 22 A. Yeah. I mean, I guess. 23 Q. On the top of Page 1, do you see a row 24 with the date March 31, 2017 at 6:37 p.m.? 25 A. Yes. But --</p>	<p style="text-align: right;">Page 391</p> <p>1 Q. Do you see -- 2 A. Go ahead. 3 Q. Do you see the username Eli Mosley 4 #5269? 5 A. Yes. 6 Q. That is your Discord username, right? 7 A. Yes. 8 Q. Do you see the message, you should get 9 a separate phone for Alt-Right stuff, then arm 10 it with a kill password to go off between noon 11 and 1:00 p.m. I activate it before I go out and 12 do things. 13 A. Yeah, I don't -- I mean, that was -- I 14 mean, that was a lie. I lied to them on 15 Discord. That is not true. 16 Q. You made that statement on Discord, 17 right? 18 A. Correct. I mean, I am saying this on 19 Discord to somebody. I don't -- I don't even 20 know how to -- I don't even know how to do that 21 on my phone. 22 Q. You agree that you said that on 23 Discord, right? 24 A. I did say that on Discord. But that 25 is not something I actually did.</p>
<p style="text-align: right;">Page 392</p> <p>1 Q. But you are saying -- you agree that 2 you said that on Discord. But when you said it, 3 it was a lie; is that correct? 4 A. Correct. 5 Q. Can you turn to Page 2 of that 6 exhibit, please? 7 Why did you lie on Discord in the 8 message we were looking at on Page 1 -- 9 A. I don't know the -- I don't know the 10 -- I could have been joking. There is no -- I 11 have no way of knowing, because there is nothing 12 before this. I have to see it in context. 13 Q. You previously said it was a lie, 14 right? 15 A. I mean, it could have been a joke, 16 could have been a lie. I don't know. I don't 17 have the context of it. It starts with that. 18 Q. You don't know if it was a lie or a 19 joke? 20 A. I mean, yeah. Like, it could have 21 been a joke, like, before this. I just have no 22 idea. This is just an out-of-context thing. 23 Q. Do you mind handing that back just for 24 a moment? Thank you. 25 A. Which one? This?</p>	<p style="text-align: right;">Page 393</p> <p>1 Q. The whole document, please. The 2 exhibit. Thank you. 3 Thank you. On Page 2 of that exhibit 4 in front of you -- 5 A. Yes. 6 Q. -- do you see a message from you, from 7 your Discord user account, where you state, I 8 have three phones? 9 A. Wait. Yeah, I see it. I see it. 10 Yeah, I definitely don't have three 11 phones. 12 Q. You made that statement on Discord, 13 right? 14 A. Correct. 15 Q. And you made that statement, I have 16 three phones, on March 31, 2017 at 6:38 p.m. 17 right? 18 A. Correct. I certainly do not have 19 three phones though. I never have. The only 20 two phones I have had has been the iPhone and 21 the Walmart one. 22 Q. Looking further down on that same 23 page, do you see a message March 31, 2017 at 24 6:38 p.m.? 25 A. When?</p>

<p style="text-align: right;">Page 394</p> <p>1 Q. 6:38 p.m. 2 A. Yes, I see. 3 Q. From Eli Mosley. 4 A. Which one? There is -- yeah, the PC 5 one? That is not a huge deal. That one? 6 Q. Do you see a message on March 31, 2017 7 from Eli Mosley stating one for work, one for 8 personal shit, and one for the Alt-Right? 9 A. Yeah, I see that. But, like I said, I 10 did not have multiple phones. 11 Q. Did you make that statement on 12 Discord? Did you write that? 13 A. Yeah. I mean, I did -- I mean, I said 14 I have three phones, right. And I said that one 15 for each thing. But I don't know -- I 16 definitely didn't have three phones. I never 17 had three phones. I don't know why I would say 18 that. I don't know if it was -- if I was 19 joking. 20 The guys that were in this chat -- I 21 don't know who deleted user, Unlimited Power, 22 is. But Gray and Wyatt, or whatever, I know we 23 -- we would constantly joke about stuff. I 24 don't know if that is what this is or not. 25 Q. Why would you say on Discord that you</p>	<p style="text-align: right;">Page 395</p> <p>1 had three phones if it wasn't true? 2 A. Like I said, I don't know -- I don't 3 know the context of these -- this conversation. 4 So, it could be that we were joking about 5 something. I don't know. 6 I definitely didn't have three phones 7 though. The only two phones I have ever had -- 8 I mean, the 610 number I have had since, like, 9 seventh grade. And, like, it has only been on 10 two different phones. The other phone I got is 11 the, umm, the Walmart one. I definitely don't 12 have three phones. 13 Q. You testified, Mr. Kline, that you had 14 a computer in 2016, right? 15 A. In 2016, yes. 16 Q. And, Mr. Kline, you testified that you 17 left that computer at your parents' place in 18 2016; is that right? 19 A. In a storage unit, or whatever. I 20 haven't touched it for awhile. 21 Q. You stated that you moved to South 22 Carolina with your girlfriend in 2016, right? 23 A. Umm, it wasn't -- it was -- it was 24 2017, I think. It was the early part of 2017. 25 I think it was the spring of 2017.</p>
<p style="text-align: right;">Page 396</p> <p>1 Q. Did you testify that you moved to 2 South Carolina with your girlfriend in late 3 2016? 4 A. I might have -- it might have been 5 2017, is what I meant. I think it was 2017 when 6 I moved there. I would have to -- I don't know 7 the exact dates. I think it would be 2017 8 though. Because late -- maybe it was late 2016 9 into early 2017. That would make sense. 10 Because I was let go from my job in late 2016, I 11 believe. Which -- and I moved there with her, 12 like, three weeks afterwards. So, that would 13 actually make sense. Like, late -- either the 14 beginning of 2017 or late 2016. 15 Q. When were you let go from your job? 16 A. Umm, I don't know the exact date. It 17 was late 2016, I think it was. It was right 18 around Christmas, I think it was. 19 Q. Who was your employer at that time? 20 A. JC Ehrlich Rentokil. 21 Q. And it was after that point that you 22 moved to South Carolina with your girlfriend? 23 A. Correct. 24 Q. When you moved to South Carolina, you 25 had testified that you did not bring the</p>	<p style="text-align: right;">Page 397</p> <p>1 computer with you, right? 2 A. Right. 3 Q. And you testified that was because you 4 couldn't store it in the car; is that right? 5 A. Yeah. It is a huge -- it is, like, a 6 huge, old tower. 7 Q. So, you did not have a computer in 8 2017, right? 9 A. No. 10 Q. You testified that the only computers 11 that you used in 2017 were Richard Spencer's and 12 your girlfriend's neighbor's computer? 13 A. Correct. Just to print stuff off. 14 Q. Only those two computers? 15 A. Correct. 16 Q. You did not have a home PC in 2017, 17 correct? 18 A. No, not in 2017, no. 2016, like I 19 said, I had the big tower thing. 20 Q. Isn't it true that, in fact, you did 21 have a home PC in 2017? 22 A. What do you mean? I don't understand. 23 Q. Isn't it true that you did have a home 24 PC in 2017? 25 A. I wasn't even -- I don't understand</p>

<p style="text-align: right;">Page 398</p> <p>1 what you mean. I had, like, a desktop. Like, I 2 don't understand. The desktop I had that I left 3 in Pennsylvania while I went to South Carolina. 4 But I don't understand what you mean. 5 Q. Isn't it true that you did have a home 6 PC in 2017? 7 A. Yeah, the one that -- the big, giant 8 tower that is at my parents' place. 9 Q. Isn't it true that you also had a work 10 computer in 2017? 11 A. Not in 2017. In 2016, before I got 12 fired from my job, yes. I had a work laptop. 13 (Exhibit 34, 3/22/2017 Discord chat, 14 marked for identification.) 15 BY MR. BARKAI: 16 Q. You are being given an exhibit that 17 has been marked Exhibit 34. 18 Do you recognize that, Mr. Kline? 19 MR. CAMPBELL: This is just Dave 20 Campbell coming back. I got disconnected. 21 BY MR. BARKAI: 22 Q. Do you recognize that exhibit, Mr. 23 Kline? 24 A. I don't -- is this a Discord message? 25 Is this a Discord message? Is that what this</p>	<p style="text-align: right;">Page 399</p> <p>1 is? 2 Q. This is your Discord chat, right? 3 A. I mean, I don't know what-- I don't 4 know what I am referencing here. 5 Q. But this is your Discord chat, right? 6 A. Correct. But I don't know what I am 7 referencing here. This is just a single 8 message. 9 Q. Do you see, Mr. Kline, on March 22, 10 2017 at 8:42 p.m. you wrote, quote, an hour 11 after my video came out with the kike and the 12 sign, he commented on it with Echo American, 13 question mark. I have the screen cap on my home 14 PC, closed quote. 15 A. Yeah, I am not sure what that is in 16 reference to. 17 Q. Did you write that on Discord? 18 A. I mean, it looks like it might be 19 mine. But it says #Convo. I don't know what 20 that means. That is not me. That is another 21 person. Like, that is clearly not me. 22 Q. You didn't write this message? 23 A. No, that is not -- that is not even 24 the way I talked online. So, that is not me. 25 That is somebody else named Convo. I know who</p>
<p style="text-align: right;">Page 400</p> <p>1 that is. They got a number next to their name. 2 So, that is not me that said that. That name 3 was Convolution, is what we called him. But 4 that definitely wasn't me. 5 Q. Your testimony is that this was not 6 you, even though you just testified this was 7 your Discord chat? 8 A. No, I can't tell because the way this 9 is formatted. It says my name underneath it, 10 but that is not me. It says it right here. It 11 says it is from Convo. 12 Q. Do you see the beginning of the 13 message the at sign before Convo #5941? 14 A. Yes. 15 Q. Do you recognize that as making this 16 chat on Discord to someone named Convo #5941? 17 A. I mean, I guess. I don't know. Like 18 I said, the formatting of this doesn't look like 19 a Discord message. 20 Q. This is your Discord username, right? 21 A. @Convo, no. The one below that, yes, 22 that is mine. But, like I said, it is taken 23 without any context. So, I don't know what it 24 is talking about, or what this is in reference 25 to.</p>	<p style="text-align: right;">Page 401</p> <p>1 Q. Eli Mosley #5269 is your username, 2 right? 3 A. Correct. 4 Q. Earlier when I asked you if this is 5 your user -- excuse me, earlier when I asked you 6 if this was your Discord chat, you said it was, 7 right? 8 A. Well, that was before I really 9 understood what I was looking at, yeah. 10 (Exhibit 35, 3/22/2017 Discord chat, 11 marked for identification.) 12 BY MR. BARKAI: 13 Q. You are being given an exhibit marked 14 Exhibit 35. 15 Do you recognize this document? 16 A. Yeah. This is another one that is 17 totally out of the context. I don't know what 18 it is referencing. 19 Q. This is a Discord chat that you made, 20 right? 21 A. Umm, I actually I think I know what 22 this one is referencing. 23 Q. The question I asked you was, this is 24 a Discord chat you made, right? 25 A. Correct.</p>

<p style="text-align: right;">Page 402</p> <p>1 Q. This was your Discord chat?</p> <p>2 A. Yes.</p> <p>3 Q. You made this message on Discord on</p> <p>4 March 22, 2017 at 5:02 p.m., right?</p> <p>5 A. Yes.</p> <p>6 Q. And you wrote on Discord, quote -- you</p> <p>7 wrote, quote, if he comes in and I have to</p> <p>8 defend myself, all they have to do is look</p> <p>9 through my computer and I am fucked. So, not</p> <p>10 really a good option, closed quote.</p> <p>11 A. Yeah. So, the only thing I can think</p> <p>12 of I am referencing there is my computer screen.</p> <p>13 I had a computer screen that I would -- at my</p> <p>14 girlfriend's house, we didn't have a TV. We</p> <p>15 used a computer screen to watch Netflix and</p> <p>16 stuff like that on.</p> <p>17 But I don't know -- I don't know --</p> <p>18 you guys gave me -- are giving these to me with</p> <p>19 no context. So, I don't know what they are</p> <p>20 about, what it is talking about. It could be</p> <p>21 talking about something else entirely than what</p> <p>22 this conversation -- or what this single comment</p> <p>23 says.</p> <p>24 Q. You did make this statement on Discord</p> <p>25 in March of 2017, right?</p>	<p style="text-align: right;">Page 403</p> <p>1 A. Correct.</p> <p>2 Q. And your testimony is that this</p> <p>3 message has to do with a computer screen?</p> <p>4 A. I don't know, because my -- I can't</p> <p>5 give a testimony on something when it is</p> <p>6 literally one sentence. If you want me to look</p> <p>7 through the entire message, maybe I can get some</p> <p>8 context what's going on.</p> <p>9 Q. You just stated at the beginning of</p> <p>10 one of your prior answers the only thing I am</p> <p>11 referencing there is my computer screen.</p> <p>12 That is your testimony?</p> <p>13 A. I said that is -- I mean, that is</p> <p>14 probably what I am referencing there. I mean,</p> <p>15 that is when I am living at the house with my</p> <p>16 girlfriend. And I know that we had a computer</p> <p>17 screen as our only screen.</p> <p>18 But I don't know what I am referencing</p> <p>19 here with the if he comes in thing. It might</p> <p>20 totally be a joke. I don't know what it is</p> <p>21 talking about. I don't know what I am talking</p> <p>22 about there. I would need the full -- like I</p> <p>23 said, I would need the full context.</p> <p>24 (Exhibit 36, 3/31/2017 Discord chat,</p> <p>25 marked for identification.)</p>
<p style="text-align: right;">Page 404</p> <p>1 BY MR. BARKAI:</p> <p>2 Q. You are being handed Exhibit 36. This</p> <p>3 was also a Discord message that you made, right?</p> <p>4 A. Yes, it looks like it.</p> <p>5 Q. This Discord chat you posted in -- on</p> <p>6 March 31, 2017 at 10:38 p.m., right?</p> <p>7 A. Correct.</p> <p>8 Q. In this chat you wrote, well, it is</p> <p>9 not a huge deal, cause the phone is backed up on</p> <p>10 my PC, closed quote, right?</p> <p>11 A. I am probably talking about the old PC</p> <p>12 I left in Pennsylvania when I moved. Because</p> <p>13 this phone hasn't been backed up for 400-</p> <p>14 something days, or 600 days, or something like</p> <p>15 that.</p> <p>16 Like I said, I left the -- I left -- I</p> <p>17 left the computer -- you guys can go through if</p> <p>18 you want. It is, like, a shitty, like, broken</p> <p>19 computer.</p> <p>20 Q. Did you back up your phone on the</p> <p>21 computer?</p> <p>22 A. Oh, yeah. I mean, way before -- like,</p> <p>23 in 2016 I backed it up. I haven't backed it up</p> <p>24 again since, I don't think.</p> <p>25 Q. Earlier today when I asked you if you</p>	<p style="text-align: right;">Page 405</p> <p>1 had backed up your phone onto a computer or any</p> <p>2 other device and you said you had not done that,</p> <p>3 that wasn't true, right?</p> <p>4 A. Well, what I thought you meant at the</p> <p>5 time, or what I meant was I haven't backed up</p> <p>6 the -- I haven't backed up this phone before,</p> <p>7 like -- 2016 -- 2016, umm, Unite the Right</p> <p>8 wasn't even a thing yet. We haven't been</p> <p>9 talking about it. So, it wasn't really in</p> <p>10 reference to it.</p> <p>11 But now -- now that I -- obviously I</p> <p>12 have had this phone for years. It has been</p> <p>13 backed up at some point on a computer. But it</p> <p>14 was backed -- so, yeah, it was backed up on an</p> <p>15 old computer. But it was forever ago.</p> <p>16 Q. Earlier today I asked you if you had</p> <p>17 backed up your phone onto a computer and you</p> <p>18 said that you had not done that. That wasn't</p> <p>19 true, right?</p> <p>20 A. Well, not -- right. But when I said</p> <p>21 that, like I said, I was saying that with the</p> <p>22 thought of reference to Unite the Right.</p> <p>23 The phone was backed up before Unite</p> <p>24 the Right was even -- Unite the Right one even</p> <p>25 happened, let alone two. So, what I am talking</p>

C E R T I F I C A T E

I, Angela N. Kilby, the officer before whom the within deposition(s) was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition(s) was duly sworn by me on said date and that the transcribed deposition of said witness is a true record of the testimony given by said witness;

That the proceeding is herein recorded fully and accurately;

That I am neither attorney nor counsel, nor related to any of the parties to the action in which these depositions were taken, and further that I am not a relative of any attorney or counsel employed by the parties hereto, or financially interested in this action.

Angela N. Kilby, Reporter
Notary Public in and for the
Commonwealth of Pennsylvania

My commission expires
June 2, 2023